

SO ORDERED.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK


CATHY SEIBEL, U.S.D.J.

S&R DEVELOPMENT ESTATES, LLC,

Plaintiff,

v.

12/23/20

No. 7:16-cv-08043-CS-PED

TOWN OF GREENBURGH, NEW YORK,

Defendant.

PROPOSED AMENDED JOINT PRETRIAL ORDER

The parties submit the following proposed amended joint pre-trial order:

1. Full caption of the action.

The full caption of the case is above.

2. Identification of trial counsel.

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Attorneys for Plaintiff

3. Brief statement concerning subject matter jurisdiction.

Plaintiffs' claims arise under the federal laws 42 U.S.C. §3604 and 42 U.S.C. §1983. The Court thus has subject matter jurisdiction under 28 U.S.C. §§1331, 1343(a)(3), and 1343(a)(4). Defendant agrees that the Court has subject matter jurisdiction.

4. Brief summary of the parties' claims and defenses to be tried.

A. Plaintiff's summary of claims.

The following claims against Defendant will be tried:

- Count I: The Town violated the Fair Housing Act by making housing unavailable because of familial status. 42 U.S.C. §3604.
- Count III: The Town violated the Fair Housing Act by making housing unavailable because of race. 42 U.S.C. §3604
- Count IV: The Town violated the Fair Housing Act by making housing unavailable, which caused a disparate impact on families with children. 42 U.S.C. §3604
- Count VI: The Town violated the Fair Housing Act by making housing unavailable, which caused a disparate impact on racial minorities. 42 U.S.C. §3604
- Count VIII: The Town violated the Equal Protection Clause by intentionally discriminating against racial minorities. 42 U.S.C. §1983.

The following claims were previously asserted against Defendant and will not be tried:

- Count IX: Violation of substantive due process under 42 U.S.C. §1983.
- Count X: Violation of procedural due process under 42 U.S.C. §1983.

B. Defendant's summary of defenses.

The following defenses will be tried:

1. S&R's claims are barred by the statute of limitations. 42 U.S.C. § 3613(a)(1)(A); 42 U.S.C. § 1983.
2. The evidence fails to prove that the Town made housing unavailable to either families with children or racial minorities.
3. The evidence fails to prove that animus toward either families with children or racial minorities was a motivating factor.

4. The evidence fails to prove that the Town knowingly acted in response to community pressure that it understood to be motivated by animus toward either families with children or racial minorities.
5. The Town's actions with respect to the Property did not perpetuate segregation.
6. The evidence fails to prove that the challenged conduct resulted in a disparate impact or disproportionate effect on either families with children or racial minorities.
7. The evidence fails to prove that S&R was treated differently from other similarly-situated developments based on race without any rational basis.
8. The Town had legitimate, non-discriminatory reasons for its actions.
9. The Town's actions did not proximately cause S&R's alleged damages.
10. S&R did not suffer lost profits.
11. S&R is not entitled to damages for the Troys' diverted time.
12. S&R failed to mitigate or otherwise act to lessen or reduce the alleged damages.
13. S&R's alleged damages resulted from its own culpable conduct and unclean hands.
14. S&R's alleged damages are speculative and unsupported by the evidence.
15. The evidence does not support an award of punitive damages.
16. The Town reserves the right to assert additional defenses based on the specific claims and issues asserted by Plaintiff at trial.

The following defenses were previously asserted by Defendant and will not be tried:

defenses asserted solely in response to S&R's dismissed due process claims; subject matter jurisdiction; immunity defenses; standing; that the challenged actions do not constitute a policy, practice, or custom for purposes of the first element of the FHA disparate impact claim; ripeness; abstention; waiver; laches; estoppel; mootness.

5. Jury demand.

Plaintiff has demanded a jury trial, *see* Doc. 78, and Defendant agrees that the case will be tried to a jury. The Court has set the trial for 15 days. *See* Minute Entry (Sept. 29, 2020).

6. Magistrate judge.

The parties have not consented to trial of the case by magistrate judge.

7. Stipulations or agreed statements of fact or law.

The parties do not have any agreed statements of fact or law at this time.

8. Witness list and summary of testimony.

A. Plaintiff's witness list.

Plaintiff intends to call the following witnesses at trial:

(1) **Rick Troy:** S&R's purchase of the Property; S&R's decision to develop it with multi-family housing; S&R's meetings with Town officials and residents; the Town's various efforts to prevent S&R from developing the Property; opposition from the Edgemont community; and the damages that S&R has incurred as a result of the Town's efforts.

(2) **Steve Troy:** S&R's purchase of the Property; S&R's decision to develop it with multi-family housing; S&R's meetings with Town officials and residents; the Town's various efforts to prevent S&R from developing the Property; opposition from the Edgemont community; and the damages that S&R has incurred as a result of the Town's efforts.

(3) **Paul Feiner:** The Town's various efforts to prevent S&R from developing the Property; the Edgemont community and its opposition to S&R developing the Property; Edgemont's incorporation efforts; and the *Fortress Bible* case.

(4) **Francis Sheehan:** The Town's various efforts to prevent S&R from developing the Property; the Edgemont community and its opposition to S&R developing the Property; Edgemont's incorporation efforts; and the *Fortress Bible* case.

(5) **Jim Ryan:** The Town's approval process; S&R's proposal to build affordable housing on the Property and the Town's treatment of that proposal; JMC's work for S&R; and S&R's attempts to move forward with developing the Property after site plan approval.

(6) **Geoff Loftus:** The Edgemont Community Council, its opposition to S&R developing the Property, and Edgemont incorporation.

(7) **Victoria Kniewel:** The Edgemont Union Free School District's capacity, the data the district maintains concerning its student population, and the district's communications with Town officials.

(8) **Sue Shirken:** The Edgemont Union Free School District's capacity, data the district maintains concerning its student population, and the district's communications with Town officials.

(9) **Mark Stellato:** The Town's first rezoning of the Property.

(10) **Town 30(b)(6):** The Town's approval of the comparator properties; the Town's possession of data concerning the school district; multifamily housing in Greenburgh; the Town's disclaimed reasons for why it rezoned the Property.

(11) **Andy Beveridge (Expert):** The racial makeup of the Town's various communities; the location of affordable-housing units in the Town and the Town's racial segregation; the impact on protected groups caused by the Town blocking S&R's market-rate and affordable-housing proposals.

(12) **Patrick Craig (Expert):** The damages that S&R has suffered as a result of the Town blocking S&R's market-rate and affordable-housing proposals.

(13) **Terri Belkas-Mitchell (Expert):** The damages that S&R has suffered as a result of the Town blocking S&R's affordable-housing proposal.

(14) **Tim Van Noy (Expert):** The damages that S&R has suffered as a result of the Town blocking S&R's market-rate and affordable-housing proposals.

B. Defendant's witness list.

1. The Town expects to call the following witnesses at trial:

(1) **Paul Feiner**, Town Supervisor: his duties and responsibilities; the operation of the Town, its budget, and the various Town Departments and Boards; the Town's history of support for diversity, including inclusionary zoning practices and support for public, affordable, and workforce ("affordable") housing; the Town's support for and purchases of property for open space preservation and parks, including the Greenburgh Nature Center ("GNC") and the 1996-1997 public discussion and Town enactment of a Conservation District overlay; Dromore Road; the Central Avenue Mixed-Use Impact ("CA") District; community concerns with respect to Central Avenue development, property assessments, taxes, and the schools; the 2006-2007 proposed Moratorium; the Town's relationship with respect to the various school districts within the Town; S&R Development Estate's ("S&R") various proposals for 1 Dromore Road ("the Property"), including S&R's proposals to donate the Property; his interactions and communications with S&R and its representatives; the 2007 zoning map change and 2012 map amendments; the Property's Restrictive Covenants; his communications and interactions with representatives of the GNC, the Sisters of the Blessed Sacrament ("Sisters"), the Edgemont Community Council ("ECC"), the Edgemont School District, and other Town groups and individuals; the development and contents of the 2016 Comprehensive Plan; and the Edgemont incorporation effort, and any other topics covered in his depositions.

(2) **Francis Sheehan**, Town Councilmember: the operation of Town government; Town zoning and planning policies and procedures; the Town's role in the development of affordable housing; the role and responsibilities of the Greenburgh Housing Authority ("GHA"); diversity in the Town; the Town's support for and purchases of property for open space preservation and parks, including the GNC; the Town's relationship with respect to the various school districts in the Town; the CA District; community concerns with respect to Central Avenue development, property assessments, taxes, and the schools; the 2006-2007 proposed Moratorium; S&R's

various proposals for the Property, including S&R's proposals to donate the Property; S&R's various site plan applications; the Edgemont Community Council ("ECC") and other Town civic associations; the 2007 zoning map change; the development and enactment of the Town's 2008 zoning legislation affecting the CA District; the Town's 2012 zoning map amendments; the development and contents of the 2016 Comprehensive Plan; the Zoning Map notation concerning the Property; Dromore Road; and the Restrictive Covenants on the Property, and any other topics covered in his depositions.

(3) Steve Bass, Former Town Councilmember: the operation of Town government; the GNC; the CA District; community concerns with respect to Central Avenue development, property assessments, taxes, and the schools; the 2006-2007 proposed Moratorium; the ECC and other civic associations; S&R's 2006-2007 proposals for the Property, including its donation proposals and its 2007 site plan application; his interactions and communications with S&R and its representatives; and the 2007 zoning map change, and any other topics covered in his deposition.

(4) Garrett Duquesne, Town Commissioner of DCDC: the operation, practices, and procedures of the DCDC, including SEQRA review and the site plan approval process; Town zoning, planning, and demographics; the Town's role in the development of multi-family and affordable housing; the CA District; the development and contents of the 2016 Comprehensive Plan; S&R's various site plan applications; Dromore Road; the approval of S&R's site plan and the status of S&R's proposed project thereafter through the present; various financial grants and grant programs administered by the Town; the Mortgage data addressed in his Declaration; and the Restrictive Covenants, and any other topics covered in his depositions or declarations.

(5) Thomas Madden, Former Town Commissioner of the Department of Community Development and Conservation ("DCDC"): the operation, practices, and procedures of the DCDC, including SEQRA review and the site plan approval process; Town zoning and planning; the Town's role in the development of multi-family and affordable housing; the CA District; the 2006-2007 Proposed Moratorium; S&R's various site plan applications; his communications and interactions with S&R and its representatives; Dromore Road; the 2007 zoning map change; the development and enactment of the Town's 2008 zoning legislation affecting the CA District; the 2012 map amendments; the development of the 2016 Comprehensive Plan and the subjects addressed therein; the Restrictive Covenants on the Property, and any other topic covered in his deposition or declaration.

(6) Hugh Schwartz, Member, Town Planning Board: Planning Board procedures and practices, including SEQRA review and the site plan approval process; Town zoning and planning; the CA District; community concerns with respect to Central Avenue development, property assessments, taxes, and the schools; the 2006-2007 proposed Moratorium; the ECC and other civic associations; the Property and S&R's various site plan applications; Dromore Road; multifamily and affordable housing in the Town, including the development and enactment of the Town's 2008 zoning legislation affecting the CA District; the Town's 2012 zoning map amendments; the Restrictive Covenants on the Property; the development and contents of the 2016 Comprehensive Plan; and the Edgemont incorporation effort, and any other topics covered in his deposition or declaration.

(7) Richard Troy, Principal and Managing Member, S&R Development Estates LLC (“S&R”): his background, education, and legal and real estate experience; the formation of S&R; the 2004 Operating Agreement of Dromore, LLC (“Operating Agreement”); the litigation against Philip Thomas, negotiations and the settlement thereof; due diligence activities and findings related to the Property and its valuation prior to the execution of the Operating Agreement up to and including S&R’s purchase of the Property from Philip Thomas in May 2006 and thereafter, including the Restrictive Covenants on the Property; S&R’s title insurance policy; S&R’s development rights with respect to the Property, 2004 to the present; S&R’s actions and intentions with respect to development of the Property, 2004 to the present, including, but not limited to, all communications with its agents, representatives, consultants and potential buyers, investors and lenders, the Town and its residents, including, but not limited to, site plan applications; S&R’s discrimination claims; S&R’s damage claims; S&R’s current and prior litigations and proceedings over the Property, including litigations against the Town; his testimony in the current and all prior litigations and proceedings over the Property; and S&R’s litigation and settlement with the Sisters, and any other topic covered in his depositions or affidavits.

(8) Stephen Troy, Principal, S&R: his background, education, and legal and real estate experience; the formation of S&R; the 2004 Operating Agreement of Dromore, LLC (“Operating Agreement”), including, but not limited to, communications with Philip Thomas; the litigation against Philip Thomas, negotiations and the settlement thereof; due diligence activities and findings related to the Property and its valuation prior to the execution of the Operating Agreement up to and including S&R’s purchase of the Property from Philip Thomas in May 2006 and thereafter, including the Restrictive Covenants on the Property; S&R’s title insurance policy; S&R’s development rights with respect to the Property, 2004 to the present; S&R’s actions and intentions with respect to development of the Property, 2004 to the present, including, but not limited to, all communications with its agents, representatives, consultants and potential buyers, investors and lenders, the Town and its residents, including, but not limited to, site plan applications; S&R’s discrimination claims; S&R’s damage claims; S&R’s current and prior litigations and proceedings over the Property, including litigations against the Town; his testimony in the current and all prior litigations and proceedings over the Property; and S&R’s litigation and settlement with the Sisters, as well as any other topic covered in his deposition.

(9) Howard Gelbtuch, Greenwich Realty Advisors, Inc.: his work in connection with the Property both as an appraiser and a real estate broker; his communications with S&R and with various potential investors and/or joint venture partners on behalf of S&R; his communications with S&R regarding the potential tax benefits of a conservation easement donation of the Property; the usual and customary due diligence investigations conducted by real estate investors or lenders in connection with their consideration of properties for investment or purchase, and any other topic covered in his deposition.

(10) Alexander Roberts, Executive Director, Community Housing Innovations: affordable housing in Westchester County; obstacles to affordable housing development; affordable housing funding; affordable housing in the Town; his work with the Town in the development of affordable housing; the County’s model zoning ordinance; the Town’s zoning laws; communications and interactions with S&R and the Town concerning S&R’s affordable housing site plan application, including demographic analyses of the Greenville CDP and

comparisons with surrounding areas; S&R's proposed affordable housing plan and his contemplated co-development partnership with S&R; options, including timing, for financing of S&R's proposed affordable housing development; communications with S&R regarding the rents to be charged in its proposed affordable housing development, and any other topic covered in his deposition.

(11) **Victor Carosi**, Former Town Commissioner of Public Works: Dromore Road; his communications and interactions with S&R's representatives, Town officials and staff with respect to the Property, including the matter of a road permit, and any other topic covered in his deposition.

(12) **John Madeo**, Executive Vice President, Mountco: financing and development of affordable housing in Westchester County; S&R's claims for damages with respect to its proposed development of affordable housing on the Property, including various site plan applications, the Restrictive Covenants, and the likelihood of LIHTC financing, as well as other subjects covered in his reports and deposition.

(13) **Jonathan Bernz**, President, Hudson Property Advisors LLC: his appraisals of S&R's Property, including its current market value, his analysis of S&R's Property appraisals, as well as other subjects covered in his reports and deposition.

(14) **Frank Cantatore**, President, Cantatore Industries: S&R's due diligence before acquiring an interest in the Property; S&R's 2007 site plan application; the Restrictive Covenants, and S&R's claims for damages, as well as other subjects covered in his reports and deposition.

(15) **William A.V. Clark**, Ph.D., U.C.L.A. Professor: S&R's disparate treatment and disparate impact claims, including all subjects covered in his reports and deposition.

2. The Town may call the following witnesses at trial if the need arises:

(16) **Mark Stellato** (possibly by designation), Former Commissioner of DCDC: the operation, practices, and procedures of the DCDC, including SEQRA review and the site plan approval process; Town zoning and planning; the Town's role in the development of multi-family and affordable housing; the 2006-2007 Town discussions about updating the Comprehensive Plan and revising the zoning code; the CA District; the 2006-2007 proposed Moratorium; and the 2007 zoning map change.

(17) **Eve Bunting Smith**, Acting Chair, Zoning Board of Appeals ("ZBA"): the role, practices and procedures of the ZBA; and the 2007 ZBA hearings and ruling on the Property.

(18) **Rohan Harrison**, ZBA Member: the role, practices and procedures of the ZBA; the 2007 ZBA hearings and ruling on the Property.

(19) **John Lucido**, Former Town Building Inspector: the operations of the Town's building department; the Town's process and requirements for obtaining a building permit; and his communications and interactions with S&R's representatives, Town officials and other staff with respect to the Property.

(20) **Richard Fon**, Town Superintendent of Public Works: Dromore Road and existing development in the area; usual and customary developer practices and sequencing for residential development in the Town; and his communications and interactions with S&R's representatives, Town officials and other staff with respect to the Property, and any other topic covered in his declaration.

(21) **Edye McCarthy**, Town Assessor: the assessed value and fair market value of the Property from 1990s to the present; tax petitions and/or tax certiorari proceedings involving the Property; land values, generally, throughout the Town; assessed values of other multifamily and single family properties within the Town, including affordable and workforce housing; the practices and procedures of the Assessor and developers in connection with the development of affordable and workforce housing in the Town; town-wide revaluation and reassessment, and any other topic covered in her declaration.

(22) **Vincent Ferrandino**, Ferrandino & Associates Inc.: affordable housing in the Town, including all matters discussed in the May 1996 Affordable Housing Study (Exhibit 513); and the development of the Town's 2016 Comprehensive Plan.

(23) **William Lawyer** (possibly by designation), Former Executive Director of the GNC: the GNC's mission, programs, operation, organization, and community usage; the history of the Town's various open space acquisitions, including the GNC, and their value to the community; the 1996-1997 public discussion and Town enactment of the Conservation District overlay in the Dromore Road area; the Property and its zoning history; his communications and interactions with S&R and its representatives, GNC representatives, Town officials, and others in connection with S&R's proposed donation of the Property; and his 2007 submission on behalf of the GNC to the ZBA regarding the Property.

(24) **Michael Sims**, Former President of the GNC Board: the GNC mission, programs, operation, organization, and community usage; the GNC grounds and the surrounding neighborhood; his communications and interactions with S&R and its representatives, GNC representatives, Town officials, and others over S&R's various proposals with respect to the Property, including its 2007 proposed donation of the Property.

(25) **Margaret Tjimos Goldberg**, Former GNC Board of Directors President and Executive Director: the GNC's mission, programs, operation, organization, and community usage; the GNC grounds and the surrounding neighborhood; her communications and interactions with S&R and its representatives, GNC representatives, Town officials, and others regarding the Property, including the Restrictive Covenants on the Property.

(26) **Robert Bernstein**, Member and President, Edgemont Community Council (ECC): his involvement in community affairs; the 2006-2007 proposed Moratorium; S&R's 2007 donation proposal; his communications and interactions with S&R or its representatives, Town officials and others regarding the Property; the 2012 zoning map amendments; his and the ECC's communications with the Town regarding the development and contents of the 2016 Comprehensive Plan; *Ross v. Town of Greenburgh et al*; the Restrictive Covenants, including

related litigation and the settlement thereof; and Edgemont incorporation efforts, and any other topic covered in his depositions.

(27) **Michelle McNally**, Member and Former President, ECC, Former member, Edgemont School Board: her participation in the 1996-1997 public discussion of the Town's enactment of a Conservation District in the Dromore area; school budget and other school issues and related resident taxpayer concerns; the 2006-2007 proposed Moratorium, S&R's 2007 donation proposal; her communications and interactions with S&R, Town officials and others regarding the Property.

(28) **Sister Mary Francis Blackmore** and/or **Sister Mary Angela Jolly**, Sisters of the Blessed Sacrament and residents of Dromore Road: the history and reason for the Nuns' move to Dromore Road; the Restrictive Covenants on the Property; and their 2019 settlement with S&R, as well as any other topics covered in their depositions.

(29) **Gary Spilatro**, Architect: the services performed for S&R in connection with the Property's appraisal; communications and interactions with S&R and its appraiser, Howard Gelbtuch, with respect to the Property.

(30) **John Sullivan**, Sullivan Architecture, PC: his development experience in the Town, including sequence and timing of site plan approvals; his work for S&R in connection with the Property, including all communications with S&R's, its representatives, and the Town; S&R's February 2, 2007 site plan application and subsequent applications; Dromore Road, the Monastery and the GNC, as well as any other topic covered in his deposition.

(31) **Gary Warshauer**, Warshauer Mellusi Warshauer Architects PC: his experience as an affordable housing architect; architectural guidelines under HCR; affordable housing funding; the Town's site plan approval process; the architectural services he has provided to S&R; and his communications and interactions with S&R, its representatives and the Town regarding the Property, as well as any other topic covered in his deposition.

(32) **James Ryan**, Principal, JMC: his experience as an engineer for developments in the Town, including his experiences with the Town Planning Board; his work on S&R's site plan applications for the Property; his communications and interactions with S&R, its representatives, Town officials, and the Town Planning Board regarding the Property, including Town approval of the site plan, Dromore Road, the restrictive covenants, and the status of S&R's project up through the present, including any other topic covered in his deposition or affidavit.

(33) **Jeffrey Mitzner**, Senior Vice President, First American Title Insurance Company: the First American Title Insurance policy on S&R's Property, including amendments thereto; communications with S&R or its representatives with respect to the Property and its Restrictive Covenants, and any related topics covered in his deposition.

(34) **Teuta Ahmedi**, Former Assistant to Philip Thomas: her communications with Philip Thomas with respect to the Property and S&R.

(35) **Janet Giris**, Delbello, Donellen, Weingarten, Wise & Wiederkerh, LLP and former Deputy Town Attorney: the 1996-1997 public hearings and Town enactment of the Conservation District overlay in the Dromore Road area; her communications and interactions with the Town regarding the Property; non-privileged facts and communications in connection with her representation of S&R, including S&R's donation proposal and its February 2, 2007 site plan application.

(36) **Susan Shirken**, Assistant Superintendent, Edgemont Union Free School District: student enrollments; the student population; District class size norms, practices and/or policies; school building capacity and space utilization; school budgets, capital bonds, and school finances, including revenues and expenditures; the Edgemont tax base; tax certioraris; the 2006-2007 reports of the District Government & Demographic Committee; and communications with the Town regarding these matters, and any other topic covered in her deposition.

(37) **Victoria Kniewel**, Superintendent of Schools, Edgemont Union Free School District: the operation and management of the Edgemont School District from 2013 to the present; the process for selecting school board members; the Town's relationship to the District; District class size norms, practices and/or policies; school building capacity and space utilization; school budgets, capital bonds, and school finances, including revenues and expenditures; communications with the Town regarding residential development, zoning and planning; and S&R's proposed project, and any other topic covered in her deposition.

(38) **Raju Abraham**, Executive Director, Greenburgh Housing Authority ("GHA"): The mission, history, operations and organization of the GHA, including its relationship to the Town; the financing of public housing and issues affecting the operation of the GHA and the existence and location of public housing in the Town, and related topics covered in his declaration.

(39) **Michael D'Addio**, Principal, Tax & Business, Markum LLP: tax implications of S&R's donation proposal; tax benefits from donations of conservation easements in general; and all other subjects covered in his report and deposition.

(40) **Ren Essene**, Chief Data Officer of the Consumer Financial Protection Bureau: authentication of HDMA data.

(41) **Karen Belanger**, Executive Director of the Westchester-Putnam School Boards Association (WPSBA) of the Westchester-Putnam School Board Association ("WPSBA"): authentication of WPSBA data.

(42) All witnesses necessary for purposes of foundation, rebuttal and impeachment.

C. Witness Objections.

S&R reiterates its prior objection to the scope of the Town's disclosed witness list, *see* Docs. 315, 321, and it does not believe the Town's modest reduction of witnesses from 47 to 41 accomplishes this Court's direction to the Town to get "the number of defense witnesses and exhibits down to a realistic and manageable number so that the JPTO serves its purpose of providing notice,"

Doc. 322. S&R still believes the Court can and should impose upper boundaries on the Town's disclosures. *See SEC v. Badian*, 822 F. Supp. 2d 352, 366-67 (S.D.N.Y. 2011) (ordering a revised pretrial disclosure). S&R further objects to Eve Bunting Smith, Rohan Harrison, Sister Mary Francis Blackmore, Sister Mary Angela Jolly, Ren Essene, and Karen Belanger because the Town did not identify them as potential witnesses in their Rule 26 disclosures. S&R also objects to portions of the Town's experts' opinions, and has filed motions in limine accordingly. S&R further reserves the right to object to testimony from the Town's 41 witnesses as irrelevant, cumulative, or otherwise unhelpful to the trial of fact.

The Town reserves all objections to S&R's witnesses and may object at the time of trial. The Town further responds that it has made a diligent, good faith effort to reduce the number of witnesses in this case, in which Plaintiff has made allegations of over ten years of discriminatory conduct, including claims for compensatory and punitive damages.

9. Deposition designations.

<u>Steven Belasco</u>			
Town Designations	S&R Objections	S&R Counter Designations (if Town designations are admitted)	Town Objections
9:10-11:4	Relevance, 403	5:10-6:14	Relevance, 403
13:7-22	Relevance, 403	7:3-14	Relevance, 403
21:11-22:12	Relevance, 403	13:23-14:20	Relevance, 403
23:19-24:14	Relevance, 403	16:23-17:8	Relevance, 403
28:11-29:9	Relevance, 403	18:2-19:5	Relevance, 403
40:14-41:20	Relevance, 403	20:17-21:10	Relevance, 403
55:16-20	Relevance, 403	22:13-18	Relevance, 403
68:3-5	Relevance, 403	67:4-68:13	Relevance, 403; if counter-designation is admitted, the Town designates 68:19-69:24
52:14-53:5	Relevance, 403		
86:19-88:7	Relevance, 403		
89:2-11 90:25-91:13 94:2-8	Relevance, 403		

10. Parties' exhibit lists.

S&R reiterates its objections to the scope of the Town's exhibit list. Despite this Court's instructions that the Town reduce their list to a "reasonable number," *see* Doc. 322, the Town has gone down from 568 exhibits only to 509 exhibits.¹ S&R still believes the Court can and should impose upper boundaries on the Town's disclosures. *See SEC v. Badian*, 822 F. Supp. 2d 352, 366-67 (S.D.N.Y. 2011) (ordering a revised pretrial disclosure).

The Town again reiterates that it has made a diligent, good faith effort to reduce the number of exhibits in this case, in which Plaintiff has made allegations of over ten years of discriminatory conduct, including claims for compensatory and punitive damages. The Town further states that it was able to reduce its Exhibits by more than ten percent.

The parties' revised exhibit lists with corresponding objections are attached as Exhibit A and Exhibit B. Both parties reserve the right to use any exhibits on the other party's exhibit list. The fact that a document is on a party's exhibit list does not waive any rights that party has to object to the same document. Each party reserves the right to add exhibits with respect to events relevant to the case that may arise after the filing of the joint pretrial order.

¹ The Town first disclosed to S&R the exhibits it was removing late in the afternoon on Friday, December 18.

11. Damages statement.

S&R seeks the following damages for each of its claims:

- Lost profits: up to \$14,023,439
- Carrying costs: \$1,140,791
- Value of S&R's principals' diverted time between 2008 and 2017: \$2,720,245
- Punitive damages: to be determined by the jury.
- Prejudgment interest to be determined by the Court.

S&R's damages expert Tim Van Noy outlines the methods for calculating S&R's damages in detail in his two expert reports, dated July 24, 2019 and August 10, 2019. In addition, S&R will prove damages for the value of its principals' diverted time. Between 2008 and 2017, the Town diverted an average of 600 hours of Rick Troy's time and 120 hours of Steve Troy's time each year from other business endeavors. Rick Troy typically earns about \$380 per hour for his work on issues unrelated to the Property. Steve Troy typically earns about \$350 per hour for his work on issues unrelated to the Property. To account for varying amounts of time the Troys spent on Property-related issues from year to year for the interest calculations in Schedule 6 of Tim Van Noy's July 24, 2019 report, S&R counted the number of Property-related emails they sent and received each year.

The Town reserves all objections as to S&R's claims for damages.

12. Less than unanimous verdicts.

The parties do not consent to a less-than unanimous verdict.

Respectfully submitted,

/s/ Bryan Weir

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December 2020, a true and correct copy of the foregoing was filed with the Clerk of the United States District Court for the Southern District of New York via the Court's CM/ECF system, which will send notice of such filing to all counsel who are registered CM/ECF users.

/s/ Tina S. Bhatt

Tina S. Bhatt
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Exhibit A
S&R Development Estates, LLC
Exhibit List

S&R Development's Exhibit List (12.22)				
Exhibit	Description	Date	Bates Number	Town Objection
21	Howie Gelbtuch Appraisal	Thursday, September 22, 2005	S&R000520	*
28	Email from Peter Rosenbaum to Rick Troy	Thursday, June 8, 2006	S&R013456	*
29	Email from Howie Gelbtuch to Rick Troy	Thursday, June 8, 2006	S&R013453	*
37	Email from Brian Carcaterra to Rick Troy	Tuesday, July 11, 2006	S&R013341	*
42	Email from Peter Rosenbaum to Rick Troy and others	Thursday, July 13, 2006	S&R014712	*
44	Email from Peter Rosenbaum to Rick Troy and Howie Gelbtuch (with original attachment)	Tuesday, July 25, 2006	S&R015785	*
45	Email from Howie Gelbtuch to Rick Troy and others	Wednesday, July 26, 2006	S&R013316	*
47	Howie Gelbtuch Appraisal	Monday, August 14, 2006	S&R015024	*
48	Howie Gelbtuch Appraisal	Sunday, August 14, 2005	S&R013292	*
60	Email from Brian Carcaterra to Rick Troy	Tuesday, January 9, 2007	S&R013234	*
63	Email from Michelle McNally to Steve Bass	Monday, January 8, 2007	TOG0009615	**
68	Letter from Westchester County concerning the proposed moratorium	Wednesday, January 31, 2007	TOG0009555	*
75	Email from Steve Bass to gblast@cit-e.net re: "Dromore Road Update"	Monday, February 26, 2007	TOG0009271	**
80	Email from Paul Feiner to gblast@cit-e.net re: "Extraordinary Secrecy, Favoritism, Violations of Open Meeting Law by Town Council"	Friday, July 13, 2007	TOG0015764	**
84	New York State School Report Card		SCHOOL00214	*
85	New York State School Report Card		SCHOOL00226	*
86	Data concerning the Edgemont School District		SCHOOL00001	*
92	Email from Garrett Duquense to Victoria Kniewel re: "Edgemont Union Free School District Charts Incremental"	Thursday, September 25, 2014	TOG00173901	**
93	Emails between Garrett Duquesne, Susan Shirken, and Victoria Kniewel re: "Town of Greenburgh Comprehensive Plan" (also Ex. 93)	Tuesday, September 30, 2014	TOG00173931	
94	Letter from Susan Shirken to Garrett Duquesne re "Questions for School District Representatives (also Ex. 114)	Thursday, January 15, 2009	TOG00000618	**
102	Email from Garrett Duquense to Victoria Kniewel re: "Edgemont Union Free School District Appendix F"	Monday, February 16, 2015	TOG00183626	**
107	Email from Paul Feiner to Victoria Kniewel concerning the school district	Friday, May 1, 2015	TOG00190637	*
111	Email from Garrett Duquesne to Edye McCarthy concerning affordable housing sites in Greenburgh	Tuesday, February 6, 2018	TOG0316862	**
113	Email from Garrett Duquense to Thomas Madden re: "Comp Plan School Districts"	Monday, November 3, 2008	TOG0035762	**
119	Email from Paul Feiner to Bob Bernstein re: the comprehensive plan (also Ex. 226)	Monday, April 6, 2015	TOG00186113	**
120	Email from Paul Feiner to the Town Board concerning complying with federal law	Tuesday, April 28, 2015	TOG00189403	*
121	Email from Paul Feiner to Bill Darger re: comprehensive plan	Monday, April 27, 2015	TOG00189083	**
123	Draft letter to the editor of the Scarsdale Inquirer from Paul Feiner	Monday, July 18, 2016	TOG0267521	**
125	Email from Garrett Duquesne to Thomas Madden re: "dromore road"	Sunday, February 12, 2012	TOG0094006	**
126	Email from Tim Lewis to Francis Sheehan concerning the Property's use	Sunday, July 29, 2012	S&R016084	*
127	Email from Garrett Duquesne to Jim Ryan re: "Building Inspector Determination"	Wednesday, January 16, 2013	TOG0121610	**
131	Email from Garrett Duquesne to Thomas Madden concerning the Property	Thursday, February 21, 2013	TOG00145679	**
140	Email from Bob Bernstein to Francis Sheehan re "Proposed Amendments to Central Ave Moratorium"	Thursday, February 15, 2007	Bernstein00041	*
144	Email from Bob Bernstein to Steve Bass and others re: "Nature Center Land Deal"	Friday, December 15, 2006	Bernstein00008	*
145	Email from Bob Bernstein to Aubrey Graf-Daniels re: "Zoning Maps"	Tuesday, February 14, 2012	Bernstein00389	*
155	Scarsdale10583 article concerning a meeting in Edgemont	Monday, April 27, 2009	S&R001559	*
156	Email from Bob Bernstein to Geoff Loftus re: Feiner I decision (also Ex. 309)	Thursday, January 12, 2012	Bernstein00269	*
157	Email from Geoff Loftus to Bob Bernstein and others re: "Dromore Road - legal status" (also Ex. 221)	Thursday, January 26, 2012	Bernstein00279	**
158	Email from Paul Feiner to Bob Bernstein concerning Ariana Calderon inquiry	Monday, April 27, 2015	TOG00188856	**
201	First American Title insurance policy	Wednesday, May 24, 2006	FA000376	*
203	S&R's Market-Rate Proposal	Friday, February 2, 2007	S&R015046	**
206	Town of Greenburgh Department of Community Development & Conservation, Meeting Sign-In Sheet	Thursday, April 1, 2004	TOG0011765	**
210	Letter from S&R to Thomas Madden re: developing the Property	Tuesday, December 19, 2006	JMC 003004	**
213	Draft letter to Mayfair/Knollwood residents	Wednesday, April 10, 2013	TOG0129824	*
215	Email from Paul Feiner to MJ Smith concerning the WESTHELP property	Wednesday, May 1, 2013	TOG0132214	*
216	Email from Andrea Kaplan to Paul Feiner re: "moratorium on development of residential properties"	Thursday, January 4, 2007	TOG0008814	**

217	Paul Feiner's Blog re: "Public Hearing Requested on Central Ave Residential Development Moratorium", https://pfeiner.blogspot.com/2007/01/public-hearing-requested-on-central.html	Thursday, January 4, 2007	S&R005786	*
218	Email from Paul Feiner to others re: "Longview meeting"	Wednesday, April 1, 2009	TOG0021690	*
220	Email from Bruce Henkin to Paul Feiner concerning Feiner I decision	Monday, January 23, 2012	TOG0092818	*
222	Email from Paul Feiner to resident re: the Property	Sunday, May 13, 2012	TOG0321802	**
223	Email from Paul Feiner to Geoff Loftus and the Town Board concerning multifamily housing	Thursday, February 14, 2013	TOG00144404	**
224	Email from Paul Feiner to Bill Darger re: comprehensive plan	Tuesday, April 28, 2015	TOG00189305	*
225	Email from Paul Feiner to Bob Bernstein and others concerning the comprehensive plan	Wednesday, April 29, 2015	TOG00189806	**
227	Email from Paul Feiner to Margaret Goldberg re "Mapping question of Dromore"	Monday, December 5, 2016	TOG0277510	**
228	Email from Marty Payson to Paul Feiner and Tim Lewis re: question	Friday, December 2, 2016	TOG00355547	**
229	Email from Paul Feiner to Mike Sigal re: "your opinion wanted" (also Ex. 255)	Monday, December 5, 2016	TOG00355674	**
230	Letter from Paul Feiner to Margaret Goldberg re: Sisters of the Blessed Sacrament & Covenant	Monday, March 18, 2013	GNC-FED001061	**
232	Email from Paul Feiner to Julie Schneyer of the Scarsdale Inquirer re: "Comments"	Monday, October 19, 2015	TOG00228408	*
245	Email from Paul Feiner to Town Board and Franklin Kaiman re: "Workforce Housing"	Monday, January 12, 2009	TOG0037808	*
246	Letter from Mark Stellato to Paul Feiner and Town Board	Monday, January 8, 2007	TOG0012295	**
247	Email from Mark Stellato to Francis Sheehan concerning BFJ analysis	Wednesday, January 17, 2007	TOG0009052	*
248	Email from Francis Sheehan to Michelle McNally re: "central ave moratorium"	Saturday, January 13, 2007	TOG0009007	**
253	Email from Francis Sheehan to Michael Sims re: "I Dromore"	Sunday, March 18, 2007	TOG0009353	**
257	Letter from Tim Lewis to Bill Harrington concerning the Property's use	Monday, July 9, 2012	TOG0098385	*
279	Emails between Town employees re: "Dromore Road Sidewalk Improvements"	Friday, April 22, 2016	TOG00251504	*
281	Email from Garrett Duquesne to Jim Ryan re Dromore Road improvements	Monday, June 13, 2016	TOG00256617	*
282	Email from Garrett Duquesne to Jim Ryan re: Dromore Road improvements	Thursday, August 11, 2016	TOG00257765	**
283	Email from Garrett Duquesne to Jim Ryan re: Dromore Road improvements	Wednesday, January 18, 2017	TOG0281435	**
284	Email from Jim Ryan to Victor Carosi re: road opening permit	Thursday, July 6, 2017	TOG00363356	**
285	Letter from Jim Ryan to James Glatthaar	Wednesday, August 23, 2017	JMC 009075	*
286	Email from Garrett Duquesne to Jim Ryan re: road opening permit	Friday, April 15, 2016	TOG00250796	**
287	Email from Victor Carosi to Jim Ryan re: road opening permit	Wednesday, May 16, 2018		**
294	Email from Facebook to Paul Feiner	Tuesday, July 5, 2016	TOG0266464	*
296	Email from Michelle McNally to others concerning re: "CA Zone"	Thursday, April 30, 2015	TOG00190259	*
300	Email from Hugh Schwartz to the Planning Board re: the proposed moratorium	Wednesday, February 7, 2007	TOG00258305	*
307	Email from Geoff Loftus to Paul Feiner and others re: "ECC meeting - Comprehensive Plan"	Wednesday, June 22, 2011	TOG0083603	**
308	ECC Meeting Minutes	Monday, January 9, 2012	S&R003845	*
310	Email from Geoff Loftus to Paul Feiner and others re: "Dromore Road - Building Permit"	Friday, January 27, 2012	TOG0093261	*
311	Paul Feiner blog post, http://pfeiner.blogspot.com/2012/01/ecc-misrepresents-my-views-on-dromore.html	Sunday, January 29, 2012	S&R000863	*
312	Email from Bob Bernstein to ECC members re: "Zoning maps"	Tuesday, February 14, 2012	Bernstein00391	*
316	ECC Memo re Dromore Defense Fund		S&R002217	*
321	Esplanade Site Plan Approval	Sunday, August 9, 2009		**
322	Avalon Green III Site Plan Approval	Wednesday, March 12, 2014		**
323	Westhab Site Plan Approval	Thursday, October 22, 2009	TOG0056281	**
342	S&R's application for a variance	Thursday, December 18, 2008	S&R001307	**
354	S&R Site Plan Application	Wednesday, June 20, 2012	JMC 003292	**
371	Email from Jim Ryan to others concerning assisted living proposal for Property	Friday, July 20, 2012	JMC 002513	*
374	Expert Report of Andy Beveridge	Wednesday, July 24, 2019		*
376	Expert Rebuttal Report of Andy Beveridge	Tuesday, September 10, 2019		*
381	Expert Report of Patrick Craig	Wednesday, July 24, 2019		*
382	Rebuttal Report of Patrick Craig	Tuesday, September 10, 2019		*
390	Rebuttal Report of Tim Van Noy	Tuesday, September 10, 2019		*
392	Expert Report of Tim Van Noy	Wednesday, July 24, 2019		*
399	Expert Report of Terri Belkas-Mitchell	Wednesday, July 24, 2019		*
400	Rebuttal Report of Terri Belkas-Mitchell	Tuesday, September 10, 2019		*
432	Scarsdale Inquirer article titled "Edgemont Inc?"	Friday, June 24, 2016	S&R004778	*

436	Email from Michelle McNally to Mark Stellato re: "Central Ave. moratorium"	Thursday, January 4, 2007	TOG0008817	**
437	Paul Feiner blog post re: the Property, http://pfeiner.blogspot.com/2007/01/momentum-building-for-acquisition-of.html	Saturday, January 6, 2007	S&R000604	*
438	Email from Michelle McNally to Tim Lewis re: draft moratorium	Saturday, January 13, 2007	TOG0015408	**
439	Email from Michelle McNally to Mark Stellato re: draft moratorium	Saturday, January 13, 2007	TOG0015407	**
440	Paul Feiner blog post re: the proposed moratorium, http://pfeiner.blogspot.com/2007/01/central-ave-residential-moratorium.html	Sunday, January 14, 2007	S&R000669	*
441	Paul Feiner letter to the editor to the Journal News	Saturday, January 13, 2007	S&R000676	*
442	Letter from Mark Stellato to the Edgemont School District re: "School District Data"	Thursday, February 8, 2007	TOG0012798	*
443	Paul Feiner blog post re: the proposed moratorium, http://pfeiner.blogspot.com/2007/01/central-ave-moratorium-on-residential.html	Sunday, January 21, 2007	S&R000675	**
444	Town Board meeting transcript, TOG0012771-74, 78-97	Wednesday, January 24, 2007	TOG0012759	*
445	Town Planning Board meeting minutes, Page 4, subsection b	Wednesday, February 7, 2007		**
446	Email from Michelle McNally to Francis Sheehan re: proposed moratorium	Saturday, February 24, 2007	TOG0321910	**
447	Email from Bob Bernstein to Steve Bass with draft press release concerning the Property	Monday, February 26, 2007	Bernstein01406	*
448	Town's Interrogatory Responses			**
452	Email from Hugh Schwartz to others concerning affordable housing	Monday, February 11, 2008	TOG0017038	*
453	Town's Responses to RFAs			**
455	Scarsdale Inquirer Article concerning the Property	Friday, March 13, 2009	S&R001557	*
456	Email from Paul Feiner to resident concerning the Property	Wednesday, April 1, 2009	TOG0021673	*
457	Email from Edgemont resident to Paul Feiner concerning the Property	Wednesday, June 10, 2009	TOG0026309	*
458	Letter to the editor of Scarsdale Inquirer concerning the Property	Friday, January 20, 2012	S&R004607	*
459	Letter to the editor and blog post by Ed Krauss concerning the Property	Friday, January 27, 2012	S&R001912	*
460	Letter from Tim Lewis to Paul Feiner and the Town Board concerning the Property	Thursday, January 26, 2012	TOG00334791	*
461	Email from Geoff Loftus to Paul Feiner and the Town Board concerning the Property	Wednesday, February 1, 2012	TOG0093481	*
462	Email from Paul Feiner to Jason Graff concerning the Property	Wednesday, May 9, 2012	TOG0096191	*
464	Transcript of Town Planning Board meeting, TOG00342009-10	Tuesday, April 23, 2013	TOG00342004	**
466	Email from Paul Feiner to Howard Hirsch concerning the comprehensive plan	Monday, April 28, 2014	TOG00165909	*
467	Email from Paul Feiner to Edgemont residents concerning the comprehensive plan	Wednesday, April 30, 2014	TOG0166217	**
468	Email from Paul Feiner to Julie Hallowell concerning the comprehensive plan	Thursday, May 1, 2014	TOG00166335	**
469	Email from Paul Feiner to Garrett Duquesne and Cynthia Adamson about ECC's concerns	Tuesday, September 16, 2014	TOG00383819	**
470	Email from Paul Feiner with draft letter to Edgemont School Board	Wednesday, October 15, 2014	TOG00174695	**
471	Email from Paul Feiner to Vivian Hua concerning multifamily housing in Edgemont	Monday, April 13, 2015	TOG00187446	**
472	Email from Paul Feiner to gblist@cit-e.net concerning car dealership law	Thursday, April 23, 2015	TOG00188536	**
473	Email from Paul Feiner to Francis Sheehan and others concerning comprehensive plan	Tuesday, April 28, 2015	TOG00189169	**
474	Site plan approval for S&R affordable housing proposal	Thursday, January 7, 2016	S&R000334	**
475	Email from Paul Feiner to Jeffrey Sherwin concerning multifamily development in Edgemont	Saturday, July 2, 2016	TOG0266291	*
476	Town Board meeting minutes (Pages 23-24)	Monday, November 9, 1981		*
477	Maps showing location of the Property, the Esplanade, the Edgemont School District, and the Greenburgh C7 School District			
478	Letter from Sisters of the Blessed Sacrament to S&R concerning the Property's development	Saturday, March 2, 2013	S&R002688	**
483	Sisters' release of covenants	Tuesday, November 19, 2019		*
485	Town's release of the covenants	Friday, September 6, 2019		**
488	Audio recording of May 12, 2013 ECC meeting	Thursday, May 17, 2012		*
489	Email from Rick Troy to the Town concerning the Property's zoning depicted in the Comprehensive Plan	Wednesday, September 28, 2016	TOG0271847	**
500	Feiner II trial court decision	Thursday, August 8, 2013		*
503	Town Comprehensive Plan	Wednesday, September 28, 2016		**
637	Town Board meeting minutes, Pages 28-39	Wednesday, September 12, 2012		**
638	S&R proposed site plan	Wednesday, February 15, 2012	TOG0004729	*
749	Town resolution approving the third phase of the Avalon development	Wednesday, March 12, 2014		**
750	Declaration of Restrictive Covenants for the Avalon development	Saturday, July 5, 2014	TOG00174108	**

751	Town resolution approving the second phase of the Avalon development	Wednesday, April 28, 2010		**
752	Title search for the Esplanade	Friday, April 17, 2020		**
753	Property data card for the Esplanade obtains from the Town of Greenburgh	Wednesday, April 22, 2020		**
754	2006 Townhouse Plans		S&R008550	*
774	Town's Answer			*
775	Video of Town Board Meeting (Part 2 34:55-37:30, Part 3 7:30-10:40, https://greenburghny.swagit.com/play/09192011-660)	Wednesday, January 10, 2007		**
776	Video of Town Board Meeting (Part 4: 6:20-Part 5-14:30, https://greenburghny.new.swagit.com/videos/78075)	Wednesday, January 24, 2007		**
778	Video of Town Board Meeting (Public Comment 1: 29:30-30:45, Public Comment 2 12:40-15:40, 21:30-24:35, 31:30-Part 3 0:00-1:35, https://greenburghny.new.swagit.com/videos/01252012-719)	Wednesday, January 25, 2012		**
780	Video of Planning Board Meeting (Part 1: 25:00-25:50, https://greenburghny.new.swagit.com/videos/79083)	Wednesday, April 17, 2013		**
781	Video of Comprehensive Plan Steering Committee Hearing (Speakers beginning at 52:15, 53:45, 1:14:30, 1:17:50, 1:29:25, https://greenburghny.swagit.com/play/04292014-855)	Tuesday, April 29, 2014		**
782	Video of Comprehensive Plan Steering Committee Hearing (Speaker beginning at Part 1, 103:15, https://greenburghny.new.swagit.com/videos/79398)	Saturday, May 10, 2014		**
783	Video of Comprehensive Plan Steering Committee Hearing (Speakers beginning at 18:30, 48:50, 53:45, 56:45, 62:15, https://greenburghny.swagit.com/play/05222014-879)	Thursday, May 22, 2014		**
784	Video of Comprehensive Plan Steering Committee Hearing, Morning session 1, 49:50-1:04:40, https://greenburghny.new.swagit.com/videos/79401 ; Morning session 2, 0:00 – 38:50, 47:00-1:03:45, 1:11:30-1:22:30, https://greenburghny.new.swagit.com/videos/79401 ; Evening session, 10:45-15:45, 22:00-30:45, 41:25-1:07:35, 1:09:45-1:30:00, 1:32:40-1:55:45, 2:04:45-2:43:30, 2:51:15- 3:02:45, 3:09:30-3:15:27, https://greenburghny.new.swagit.com/videos/79402	Tuesday, April 28, 2015		**
785	Video of Planning Board Meeting, Part 1: 25:00-25:50, https://greenburghny.new.swagit.com/videos/79083	Wednesday, February 3, 2016		**
786	Video of Town Board Meeting, CD1, CO 1, https://greenburghny.swagit.com/play/10262016-1265	Wednesday, October 26, 2016		**
787	Video of Town Board Work Session, 15:50 -18:00, https://greenburghny.new.swagit.com/videos/78849	Tuesday, January 24, 2017		**
788	Video of Town Board Meeting, Second Public Comment, 3:15 – 6:32, https://greenburghny.new.swagit.com/videos/01252017-1	Wednesday, January 25, 2017		**
789	Current Town Zoning Map & Zoning Narrative (Ex. 490 Figures 1&2)			**
791	Draft letter to members of Valhalla School Board	Tuesday, April 30, 2013	TOG0132191	*
792	Edgemont Meeting Minutes from the Comprehensive Plan Update	Thursday, April 10, 2008	TOG0135783	**
793	Email from Garrett Duquesne to Victoria Kniewel and Susan Shirken re: Edgemont school data	Wednesday, June 25, 2014	TOG00169322	**
794	Email from Mike Sigal to the Town Board concerning S&R's proposed development	Sunday, February 17, 2013	TOG001447845	*
795	Email from Nancy Taddkien to Paul Feiner	Tuesday, February 27, 2007	TOG0009298	*
796	Email from Patricia Arpaia to Garrett Duquesne concernig public comments on the comprehensive plan	Thursday, May 7, 2015	TOG00192860	**
797	Email from Paul Feiner to Bill Darger re: comprehensive plan	Tuesday, April 28, 2015	TOG00189212	*
798	Email from Paul Feiner to Bob Bernstein	Wednesday, April 29, 2015	TOG00189706	*
799	Email from Paul Feiner to Clinton Eller re: multifamily housing	Wednesday, April 27, 2016	TOG00251819	**
800	Email from Paul Feiner to Deidre Lewis re: Dromore Road - legal status	Thursday, January 26, 2012	TOG0093215	**
801	Email from Paul Feiner to Dennis Kalian re: Edgemont and Esplanade	Sunday, May 15, 2016	TOG00252430	**
802	Email from Paul Feiner to Edgemont property owner re: apartments	Thursday, October 30, 2014	TOG00176026	**
803	Email from Paul Feiner to Edgemont resident re: comprehensive plan	Saturday, February 7, 2015	TOG00183230	**
804	Email from Paul Feiner to Edgemont resident re: incorporation	Monday, February 27, 2017	TOG0284818	**
805	Email from Paul Feiner to GNC leadership re: "dromore road"	Friday, October 16, 2015	TOG00227185	**
806	Email from Paul Feiner to Kevin Plunkett re: Westhelp	Tuesday, October 28, 2014	TOG00175661	*
807	Email from Paul Feiner to Lawrence Cain concerning Westhelp development	Wednesday, October 10, 2012	TOG0113366	**
808	Email from Paul Feiner to resident re: Edgemont	Wednesday, April 1, 2009	TOG0021721	*
809	Email from Paul Feiner to Scarsdale Inquirer	Wednesday, February 8, 2012	TOG0093719	*
810	Email from Paul Feiner to the Scarsdale Inquirer re: Westhelp	Thursday, October 4, 2012	TOG0113149	**
811	Email from Paul Feiner to the Town Board and others re: comprehensive plan	Saturday, April 4, 2015	TOG00186029	**
812	Email from Paul Feiner to the Town Board and others re: Westhelp	Sunday, April 7, 2013	TOG0129383	*
813	Email from Paul Feiner to the Town Board and others re: Westhelp	Wednesday, January 22, 2014	TOG00157697	**
814	Email from Paul Feiner to the Town Board concerning Westhelp development	Friday, October 24, 2014	TOG00175509	*
815	Email from Tim Lewis to Bob Bernstein concerning the Property's use	Friday, August 17, 2012	TOG0100820	*

816	Emails from residents concerning the comprehensive plan	Thursday, April 30, 2015	TOG00192861	*
817	Feiner I Appellate Decision	Thursday, December 26, 2013		*
818	Feiner I Trial Court Decision	Tuesday, January 10, 2012		*
819	Feiner II Appellate Decision	Wednesday, October 14, 2015		*
820	Fortress Bible Church v. Feiner, 734 F. Supp. 2d 409 (S.D.N.Y. 2010)	Thursday, August 12, 2010		*
821	Google Maps Directions between the Property and the Esplanade, https://bit.ly/2UjoHer			
822	Paul Feiner Blog post, http://pfeiner.blogspot.com/2007/01/why-moratorium-on-residential.html	Monday, January 8, 2007		*
823	Paul Feiner Blog Post, http://pfeiner.blogspot.com/2007/07/extraordinary-secrecy-favoritism.html	Friday, July 13, 2007		*
825	Scarsdale Inquirer letter to the editor from Hugh Schwartz	Friday, August 19, 2016	S&R004754	*
826	S&R's bank statements and checks		S&R030086-906	**
827	Summary of S&R's bank statements and checks		S&R030909	*
828	Video, Edgemont Petition to Incorporate to a Village, https://bit.ly/366Uyn6	Wednesday, March 22, 2017		*
829	Photos of Dromore Road			*
830	Town of Greenburgh tax assessments of the Property (2007-16)		S&R007730-7800, S&R017108-17184	*
831	Town of Greenburgh tax assessments of the Property (2017-19)			*
832	Edgemont School District Release of Property			*
833	Email from Brian Carcaterra to Rick Troy	Thursday, July 6, 2006	S&R013382	*

Exhibit B

Town of Greenburgh Exhibit List

Town of Greenburgh's Exhibit List (12/22/20)				
EX.	DATE	NAME/DESCRIPTION	BATES	S&R OBJECTIONS
1	2006-07-18	John Sullivan Memorandum to Richard and Stephen Troy re 62 Dromore Road	SULL011	*
2	2006-08-28	Fully Executed Sullivan Proposal for Architectural Services	S&R025309- S&R025320	**
9	2006-12-15	Email: Madden to James Ryan, forwards Feiner's 12/14/06 blog post	JMC007790- JMC007791	*
10	2006-09-15	6 drawings by CJP (S.1, SK.1, SK.2, SK.2A, SK.3, SK.4)		**
11	2007-01-03	Email: Steve to Rick Troy re Sullivan is preparing a package of elevations and floor plans.	S&R013250	*
12	2007-01-08	Email: John Sullivan to Janet Giris re Dromore Road Property	JMC009329- JMC009330	*
14	2007-02-14	Email: Stephen Troy to Richard Troy re Meeting with Thomas Madden	S&R013161-S&R013162	*
16	2007-02-28	Email: Stephen Troy to John Sullivan re Response to Comments by Thomas Madden	S&R013124- S&R013128	**
20	2005-05-23	Gelbtuch Invoice and Payment	S&R015608-S&R015610	*
21	2005-09-22	Howard Gelbtuch Appraisal re 1 Dromore Road	S&R000520 - S&R000540	**
22	2005-09-22	Letter: Howard Gelbtuch to John Loveless re 1 Dromore Road	S&R000519	*
23	2005-09-26	Email: Gelbtuch to Loveless re dromore road	S&R029206	*
24	2006-01-26	Email: Gelbtuch to R Troy re dromore road appraisal	S&R29202	*
25	2006-02-28	Letter: Stephen Troy to Howard Gelbtuch re 1 Dromore Road	S&R014729- S&R014730	**
26	2006-05-30	Letter: Stephen Troy to Howard Gelbtuch re 1 Dromore Road	S&R024913 - S&R024914	**
27	2006-06-06	Email Gelbtuch to R Troy re dromore road	S&R013460	*
29	2006-06-08	Email: Howard Gelbtuch to Richard Troy re Apollo Proposal	S&R013453- S&R013454	**
30	2006-06-12	Letter: Richard Troy to Howard Gelbtuch re 1 Dromore Road	S&R024909- S&R024910	**
31	2006-06-14	Email Gelbtuch to R Troy re dromore road	S&R013438	*
32	2006-11-30	Email: Brian Kraut of Ackman Ziff to Steve Troy asking if there were any new developments	S&R013262- S&R013263	**
35	2006-07-06	Email: Gelbtuch to R.Troy and others re dromore meeting	S&R013389	*
36	2006-07-06	Email: Gelbtuch to R.Troy re background on meeting participants	S&R013385-013386	**
41	2006-07-12	Letter: Richard Troy to Howard Gelbtuch re 1 Dromore Road	S&R024911 - S&R024912	**
44	2006-07-25	Email: Peter Rosenbaum to Richard Troy re Dromore Road Development	S&R015785	*
45	2006-07-26	Email: Howard Gelbtuch to Richard Troy re Dromore Road	S&R013316- S&R013320	**
46	2006-08-10	Email: Howard Gelbtuch to Richard Troy re Dromore Road	S&R013312	**
47	2006-08-14	Howard Gelbtuch Appraisal	S&R015024 - S&R015045	**
49	2006-08-15	Email: Howard Gelbtuch to Richard Troy re Dromore Road/Rieger Homes	S&R013290	*
52	2006-09-05	Email: R.Troy to Gelbtuch re dromore road	S&R013287	*
54	2006-09-05	Email: Gelbtuch to R.Rieger re meeting	S&R013285	*
57	2006-12-08	Email: Gelbtuch to Troys, attaching Dromore Conservation Notes, showing that the adjusted value of the conservation easement is \$6,775,000	S&R015727- S&R015728	*
59	2007-01-03	Letter: Rick Troy to Gelbtuch re value of property	S&R024907 - S&R024908	*
60	2007-01-09	Email: Brian Carcaterra to R.Troy re market report	S&R013234-013238	*
62	2008-09-26	Email: R.Troy to Gelbtuch re town sabotage of dromore project	S&R012921-012922	*
66	2006-12-14	Email: Bernstein to McNally	Bernstein00005 - Bernstein00007	*
74	2007-03-06	BFJ Memorandum re Central Avenue, Affordable Housing and Proposed Moratorium	TOG0015498 - TOG0015502	**
75	2007-02-26	Email: Gblist on behalf of Steve Bass RE: Dromore Road update	TOG0009271	*
79	2007-02-27	Memo from Stellato to Lepre re Town of Greenburgh Zoning Map	TOG0003728	*
81	2007-01-16	Email from F. Sheehan to himself re Memo to Steve Bass - Affordable Workforce Housing	TOG0009036-39	*
84	2005-2011	Chart: Fiscal Accountability Summary for Edgemont UFSD Years 2005 - 2011	SCHOOL00214- SCHOOL00224	**
85	2012-2016	Chart: Fiscal Accountability Summary for Edgemont UFSD Years 2012-2016	SCHOOL00226- SCHOOL00253	**
86	2005-2017	Edgmont School District Enrollment Data	SCHOOL00001- SCHOOL00012	**
87	2006-02-28	Government and Demographic Advisory Committee, Interim Report to Board of Education	SCHOOL00254-SCHOOL00265	*
88	2007-02-04	Government and Demographic Advisory Committee, Second Report to the Edgemont Board of Education	S&R016818-S&R016835	*
91	2014-05-28	Letter: Edgemont Board of Education Resolution re Comprehensive Plan	SCHOOL00486	*
92	2014-09-25	Email: Duquesne to Kniewel RE: FW: Town of Greenburgh Comprehensive Plan	TOG00173901- TOG00173906	**
93	2014-09-30	Email Chain: Garrett Duquesne & Shirken / Kniewel RE: Town of Greenburgh Comprehensive Plan	TOG00173931- TOG00173935	**
94	2009-01-15	Email: Susan Shirken to Garrett Duquesne re Questions for School District Representatives	TOG0000618- TOG0000622	
95	2012-01-30	Email from Taddiken to Jeffery Kehl forwarding Feiner email asking to meet with Edgemont school board.	EUFS000862- EUFS000863	*
97	2006-02-28	Government and Demographic Advisory Committee, Interim Report to Board of Education, PowerPoint Slides	TOG00258218-TOG00258323	*
98	2011-11-28	Scarsdale 10583 Article Titled "How Will the NYS Property Tax Cap Affect Edgemont Schools"		*
99	Spring 2007	Newsletter: Edgemont School & Community News		*

100	2012-01-03	Scarsdale 10583 Article Titled "Edgemont Grapples with Challenging School Budget"		*
102	2015-02-16	Email: Garrett Duquense to Kniewel RE: Edgemont Union Free School District 2-11-15 Appendix F	TOG00183626- TOG00183627	**
107	2015-05-01	Email: Feiner to Kniewel RE: comprehensive plan concern	TOG00190637- TOG00190639	**
108	2015-04-29	Email: Feiner to Kniewel RE:	TOG00189600-TOG00189603	*
132	2013-02-21	Garrett Email to McLaughlin	TOG00338311	*
142	2007-02-03	Email: Robert Bernstein to Michelle McNally re Dromore	Bernstein00034- Bernstein00036	*
143	2007-01-24	Central Avenue Residential Moratorium Presentation to the Town Board	Bernstein00001- Bernstein00004	*
146	2007-02-26	Email from R. Bernstein to G. Kaminer re possible press release	Bernstein00051	*
147	2007-02-28	Email: Robert Bernstein to Francis Sheehan re New York Law re Zoning Maps	Bernstein00056-Bernstein00060	*
153	2013-04-11	4/11/13 Ludden Email to Bernstein	GNC-FED001599- GNC-FED001600	*
161	2007-02-02	Email Bernstein to R Troy re Draft Gift Agreement	S&R013196-S&R013199	*
162	2006-00-00	Memo: S&R and Michael Sims Memorandum of Non-Binding Discussions and Tentative Non-Binding Mutual Understandings	P000689- P000692	*
163	2007-02-02	Email: Robert Bernstein to Richard Troy re Donation Proposal	P000697 - P000700	*
164	2007-02-02	Email: Richard Troy to Robert Bernstein re Donation Proposal	P000701	*
165	2007-02-02	Email: Richard Troy to Robert Bernstein re Donation Proposal	P000702	*
166	2007-02-02	Email: Robert Bernstein to Richard Troy re Donation Proposal	P000703	*
167	2007-02-02	Email R. Bernstein to R. Troy re additional thoughts on MOU / gift agreement	P000704-P000705	*
175	2015-11-09	Email: Alec Roberts to D.Post, J.Glatthaar, S.Troy re greenburgh project	S&R029238-029239	*
180	2015-11-27	Email: R. Troy to Alec Roberts RE; Draft Letter to Greenburgh with Maps	S&R029236-S&R029237	*
187	2016-10-27	Email: Alec Roberts to Rick Troy re dromore road	COMMUNITY00000195	*
193	2007-09-10	50-H Transcript of Rick Troy		*
196	2004-02-15	Draft First American Title Insurance Policy	FA331-FA336	*
197	2004-06-30	Letter: Richard Troy to Robert Helpen/First American	FA091 - FA131	*
198	2006-02-16	Letter: Deana Wahab to Michael Wien re Draft First American Title Insurance Policy	FA070 - FA074	*
199	2006-03-15	Letters: Deana Wahab to Michael Wien re Draft First American Title Insurance Policy	FA075-FA089	*
201	2006-05-24	Final First American Title Insurance Policy	FA000376 - FA000387	**
202	2006-05-16	Draft First American Title Insurance Co. Policy (excerpts)	FA176-FA179	*
204		Photographs	TOG141310-TOG141344	*
205	2004-03-08	Fax: Richard Troy to Peter Gaito	PG000009 - PG000010	*
206	2004-04-01	DCDC Meeting Sign-In Sheet	TOG0011765	**
207	2004-08-27	Dromore LLC Operating Agreement	S&R015272 - S&R015299	*
208	2006-10-10	Montana Land Reliance Article titled "Good News for Conservation Tax Incentives"	S&R004868 - S&R004870	*
209	2006-10-11	Planned Giving Design Center article titled "Conservation Easement & Appraiser Penalty Provisions in PPA 2006"	S&R004857 - S&R004861	*
210	2006-12-19	S&R Letter to Madden re Agenda for 12/10/06 mtg	JMC003004 - JMC003008	**
211	2007-01-17	S&R Letter to Planning Board		**
217	2007-01-04	Paul Feiner Blog Post re Proposed Moratorium	S&R005786 - S&R005807	**
234	2005-10-25	S&R Complaint Against Philip Thomas	S&R014915 - S&R014917	*
235	2005-09-20	Philip Thomas Affidavit	P000427 - P000436	*
236	2006-02-16	Settlement Stipulation in Thomas Litigation		*
240	2007-01-18	Bill Lawyer Memorandum Summarizing Meeting re Proposed Property Donation	S&R015196	*
241	2009-06-02	Email: Stephen Troy to Richard Troy re John Sullivan's Revised Plan	S&R012868 - S&R012869	*
244	2007-02-14	S&R Letter to Planning Board	S&R000847 - S&R000851	**
247	2007-01-17	BFJ Email to Stellato	TOG0009052 - TOG0009053	**
252	2007-02-28	Email: Robert Bernstein to Francis Sheehan re New York Law re Zoning Maps	TOG0321920 - TOG0321923	*
263	2007-08-13	Affidavit of William Lawyer Submitted to ZBA		*
267	2006-12-14	Email: Bill Lawyer to Feiner and others attaching memo of Dromore Road property background	TOG0008703-TOG0008706	*
270	2007-02-05	Proposal to Acquire Dromore Road Property for Open Space Preservation, Draft Prepared by Bill Lawyer	GNC-FED001153-GNC-FED001154	*
285	2017-08-23	Letter: Ryan to Glatthaar re JMC Project 6103	JMC009075	**
287	2018-05-17	Email: James Ryan to Rick Troy RE: Dromore Road		**
299	2007-01-17	Planning Board Meeting Minutes	TOG0013424-TOG0013428	*
300	2007-02-07	Email: Stephanie Kavourias to Hugh Schwartz re Planning Board Meeting	TOG00258305-TOG00258309	**
306	2009-03-29	Email: Fran McLaughlin to Planning Board re Dromore Road-SEQRA	TOG0043772	*
319	2007-07-19	Mark Stellato Memorandum to ZBA re Zoning History Study of 1 Dromore Road	TOG0003675-TOG0003704	*
320	2007-11-09	ZBA Decision	S&R00020-S&R00024	*

321	2009-08-04	The Esplanade Site Approval Letter		**
322	2014-03-12	Avalon Green III Site Approval Letter		**
323	2010-01-05	Email: Garrett Duquesne to Janet Giris attaching Westhab, Inc Site Plan Approval Letter	TOG0056281-TOG0056310	**
325	2014-06-24	TOG School Budgets & Rates 2002-2011 and Handwritten Notes from Meeting with EUFSD	TOG00386751-TOG00386762	*
327	2014-06-14	Greenburgh Central School Notes	TOG00387669-TOG00387670	*
329	2007-02-07	Planning Board Meeting Transcript		*
330	2006-07-19	JMC Proposal for Site Planning and Engineering Services	S&R007374-S&R007377	*
331	2006-10-10	S&R's Demolition Permit Application	S&R008278-S&R008279	*
332	2006-10-17	Slope Clearance Form	S&R001393-S&R001394	*
333	2006-10-17	Wetland/Watercourse Clearance Form	S&R001396-S&R001397	*
335	2006-10-31	Email: Rick Troy to Bob Roth regarding geotech analysis of Dromore Road	JMC00276	*
337	2006-12-15	Certificate of Demolition Completion	S&R024781	*
338	2007-01-17	Draft letter by S&R to the Planning Board	JMC009224-JMC009232	*
339	2007-02-09	Email: Thomas Madden to Robert Roth re 62 Dromore Road	TOG0009239-TOG0009250	*
342	2008-12-18	2008 Use Variance Application	S&R001307- S&R001434 (drawings JMC000547-JMC000554)	*
343	2009-12-23	Letter from Thomas Madden to William Harrington re S&R Site Plan	TOG0056884-TOG0056897	*
344	2009-08-14	S&R Revised Use Variance Site Plan Application	JMC5139-JMC5276 (drawings JMC000557-JMC000565)	**
345	2009-11-18	Planning Board Meeting Minutes	JMC001495-JMC001512	*
346	2012-03-21	3/21/12 PB Mtg. Min.	TOG0005536-TOG0005546	*
347	2012-03-14	Email: Bob Roth Email to Jim Ryan RE: Dromore Road	JMC009510	*
348	2012-03-29	Bob Roth Email to Thomas Schmidt of JMC	JMC006770-JMC006793	*
350	2012-04-10	Letter from Garrett Duquesne to S&R	JMC006853	*
352	2012-05-31	Email from JMC to Rick with subject "Dromore Survey"	JMC001530	*
352a	2012-05-31	Survey of Property	JMC001532	*
352b	2012-05-31	Topographic Survey of Property	JMC001533	*
353	2012-06-20	Letter from JMC to Town - revised submission based on DCDC comments	JMC002098	*
354	2012-06-20	Site Plan Application	JMC003292-JMC003326	**
355	2012-07-13	JMC Meeting Minutes	JMC009111	*
358	2013-02-08	Email Sysak to Glatthaar re Last night's hearing	JMC008402-JMC008410	*
359	2013-03-21	Email: Duquesne to James Ryan re PB 12-07 S&R Development	JMC003697-JMC003719	*
361	2013-04-02	Letter from JMC to Duquesne Enclosing Complete Site Plan Submission to Planning Board	TOG0004851-TOG0004928	*
370	2012-09-13	Email: James Ryan to Rick Troy RE: Greenberg		*
373	2019-07-24	Clark Expert Report		*
385	2006-07-11	Emails with Brian Carcaterra	NKF0025-NKF0037	*
387		Brochure: The River House at Hudson Harbor		*
401		Printout Affordable Housing Resource Center		*
406	2017-07-13	Westchester County Analysis of Impediments: Supplement to Chapter Twelve - Zoning Analysis		*
408	2015-11-12	Article: Occupational Fraud Prevention in Construction by Tim Van Noy		*
434	2007-07-09	Richard Troy ZBA Affidavit	TOG0093720 - TOG0093744	*
437	2007-01-06	Paul Feiner Blog Post: Momentum Building for Aquisition of Open Space	S&R000604 - S&R000611	*
440	2007-01-14	Paul Feiner Blog Post re Moratorium Hearing	S&R000669 - S&R000674	*
443	2007-01-21	Paul Feiner Blog Post re Proposed Moratorium	S&R000675	*
444	2007-01-24	Town Board Meeting Transcript re Proposed Moratorium	TOG0012759 - TOG0012797	*
451	2009-01-20	Feiner I Petition		*
456	2019-04-01	Email Zach Margulis-Ohnuma to Feiner re Questions about a recent meeting	TOG0021673	*
474	2016-01-07	Site Plan Approval Letter	S&R000334	**
478	2013-03-02	Letter from Sisters to S&R re covenants	S&R002688	*
479	2014-02-07	Decision in S&R v. Town of Greenburgh (60912/2013)		*
482	2016-04-25	Email: Cathy Ludden to Tim Lewis RE: Dromore Road Litigation	TOG00384650	*
485	2019-09-04	Town Release of Covenants		**
504	2016-00-00	Excerpt of Town Law Manual §2-17 (Supervisor)		*
511	1971-12-05	Linda Greenhouse, "Scatter-Site Project Begun in Greenburgh Ceremony," NY Times		*
512	1988-09-18	Tessa Melvin, "A Low-Income Housing Site, 15 Years Later," NY Times		*

513	1996-05-01	Ferrandino & Associates Inc., Greenburgh Affordable Housing Study	TOG0008380-TOG0008491	*
516	2006-05-31	Joint Town Board and Planning Board Meeting Transcript		*
517	2006-06-14	Town Board Meeting Minutes & Transcript		*
518	2008-12-18	Town Board Meeting Minutes and Transcript		*
519		Town Code Section 285-41		*
522	2017-01-26	01/26/17 Zoning Map	TOG0017086	**
524		Photos of the GNC from website		*
525	2018-04-12	4/12/18 Blackmore Aff		*
527	1996-10-13	Roberta Hershenson, "Development Becomes an Issue at Greenburgh Nature Center," NY Times		*
528		Photo of Scarsdale Woods		*
529	2006-06-23	Munson Company Survey		*
532	2007-08-08	Mark Stellato Memorandum to ZBA re Zoning History Study of 1 Dromore Road	TOG0006213-TOG0006214	*
533	1957-00-00	1957 Town Zoning Map	TOG0017051	*
534	1969-01-14	Town Zoning Map (supplemental)		*
535	1980-00-00	Town Zoning Map		*
536	1984-00-00	Town Zoning Map	TOG0017061	*
537	1987-07-01	Town Zoning Map	TOG0017066	*
538	1987-08-01	Town Zoning Map		*
539	1991-01-01	Town Zoning Map		*
540	1991-07-01	Town Zoning Map	TOG0017070	*
542		Town Code Section 285-12		*
543		Town Code Section 285-10A		*
547	2012-05-25	Excerpts of CPSC Zoning Map Report	TOG0001741, TOG0002020, TOG0002021	*
548		Town Code Section 285-29.1		*
549	1978-05-24	Town Board Meeting Minutes Regarding Proposed CA District		*
550	1976-10-01	October 1976 Central Avenue Corridor Summary Report		*
551	1980-06-25	Town Board Resolution Adopting New Zoning Ordinance		*
552	1996-11-06	Planning Board Hearing Transcript Regarding Conservation District Overlay	TOG0140428-TOG0140469	*
553	1997-04-09	Local Law No. 5 Creating Conservation District Overlay	TOG0140362-TOG0140366	*
554		Town Code Section 285-9		*
555	1958-00-00	Tax Map		*
556	1997-05-21	Planning Board Public Hearing Transcript	TOG0139587-TOG0139601	*
558	1997-11-01	Town Zoning Map		*
559	2000-06-01	Town Zoning Map		*
560	2006-06-01	Town Zoning Map		*
561	2007-02-01	Town Zoning Map	TOG0017079	*
562	2007-08-09	Nathan Prystowsky Memorandum to Edward Lieberman re Zoning Analysis	TOG0010564	*
563	2011-10-07	Affidavit of Thomas Madden in 09-1904 (Feiner I)		*
565		Town Code Section 285-64		*
567	1995-1997	Town Personnel File of Janet Giris		*
568	1999-07-02	Dromore Deed between O'Kun and Thomas	Covenant Lit Dkt. 167	*
569	2019-03-15	Philip Thomas Aff		*
571	2004-08-31	S&R Articles of Incorporation	S&R014970 - S&R014979	**
572	2019-07-24	Cantatore Report		*
573	2004-03-04	Letter: Gary Spilatro to Richard Troy re 62 Dromore Road	SPILATRO 0051-SPILATRO 0059	
574	2004-03-25	Fax: Peter Gaito to Thomas Madden	PG0000002-PG0000004	*
576	1999-07-01	Substitute Certificate of Occupancy for O'Kun Property		*
578	2007-08-30	John Lucido Memorandum Submitted to ZBA	S&R018864	*
579	2019-04-05	Covenant Decision		*
580	2013-02-19	ECC Letter to Lewis and PB re S&R's Site Plan App.	JMC007035-JMC007043	*
582	2006-02-17	Email: Michael Wien to Jill Lane re 1 Dromore Road		*
583	2006-05-17	Email: Jeffrey Mitzner to Michael Wien re Draft First American Title Insurance Policy	TANNENBAUM 0034 - TANNENBAUM 0044	*
584	2006-05-22	Email: Michael Wien to Jeffrey Mitzner re Draft First American Title Insurance Policy	S&R023303 - S&R023304	*
585	2006-05-24	Contract of Sale Between Philip Thomas and S&R	S&R014801 - S&R014830	**
587	2017-01-10	Covenant Decision		*

590	2006-12-14	Feiner Blog Post: An Opportunity to Save Open Space in Edgemont and Help the Nature Center		*
591		IRS Form 8283		*
592	2006-12-11	Email S Troy to J Sullivan re 1 Dromore	S&R013259	**
593	2007-01-05	Email: Mark Weingarten to Paul Feiner re Troy/Nature Center	TOG0008840	*
594	2006-09-27	Town Board Meeting Minutes and Transcript		*
595	2006-09-11	ECC Minutes		*
596	2006-10-10	McNally/ECC Letter to TB		*
600	2007-02-28	Town Board Minutes and Transcript		*
601	2007-04-26	S&R Appeal to ZBA	S&R016731-S&R016755	*
602	2007-07-19	ZBA Hearing Transcript Excerpt	TOG0006613-TOG0006630	*
604	2007-08-16	ZBA Hearing Transcript Excerpt	TOG0006656-TOG0006679	*
606	2007-09-20	ZBA Public Hearing Transcript	TOG0014400-TOG0014455	*
607	2011-01-28	Deposition Transcript of Steven Belasco	S&R001359-S&R001490	*
613	2019-07-24	Madeo Expert Report		*
614	2009-04-02	Thomas Madden Letter to William Harrington re S&R Site Plan	TOG0053235-TOG0053238	*
615	2009-08-11	Slope Clearance and Wetland/Watercourse Clearance Forms		*
619	2011-10-28	Audio Recording of CPSC Meeting		*
620	2011-12-12	Email: Edye McCarthy to Anthony Fabrizio re Town of Greenburgh GIS Zoning Map	TOG00386740	*
621	2011-12-21	Email: Garrett Duquesne to Anthony Fabrizio re Zoning Map	TOG0090641-TOG0090642	*
622	2012-01-13	Email: Giris to Lucido RE: Sheraton	TOG0091967-TOG0091969	*
628	2012-02-28	Town Board Resolution to Review Zoning Map		*
629	2013-04-23	Tim Lewis Aff. in Feiner II		*
630	2012-05-25	Memo: CPSC to Town Board		*
631	2012-05-25	Town Board Resolution Referring Local Law	RA570-RA573	*
633	2012-06-20	Planning Board Meeting Minutes and Transcript		*
634	2012-07-18	Planning Board Meeting Minutes and Transcript		*
635	2012-07-19	Planning Board Recommendation to Town Board	RA503-RA504	*
637	2012-09-12	Town Board Meeting Minutes		*
639	2013-04-23	Garrett Duquesne Aff. in Feiner II		*
640	2012-09-12	PB Meeting Minutes		*
641	2013-02-06	PB Hr'g Tr.	TOG00144427-TOG00144473	*
642	2013-02-20	PB Hr'g Tr	JMC002506	*
643	2013-01-16	PB Meeting Minutes and Transcript		*
644	2012-12-05	Planning Board Meeting Minutes		*
645	2013-03-20	PB Hr'g Tr	TOG0005813-TOG0005870	*
647	2013-02-20	GNC Letter to PB re S&R's Site Plan App.	JMC007148-JMC007153	*
648		Town Code Section 285-57C		*
649	2019-05-23	Lewis Letter to Jakoby		*
651	2013-08-20	Town Notice of Appeal in Feiner II		*
653	2017-05-04	Westchester Municipal Planning Federation Letter to Feiner	TOG0003354	*
655	2016-03-04	Covenant Litigation Complaint		*
656	2019-09-20	Stip. as to Sisters		*
671	2019-07-24	Initial Expert Appraisal & Correction Report by Jonathan Bernz		*
672	2019-09-10	Clark Expert Rebuttal Report		*
674		Town Code Section 285-6 & 7		*
675		Greenville CDP Boundary Change 2000-2010		*
677		Greenburgh Subsidized Housing Income Limits		*
678	2019-04-24	HUD FY 2019 Income Limits Notice		*
679		HUD Housing Choice Voucher Factsheet		*
683	2006-10-23	Feiner Blog Post: Blog About the Blog		*
685	2007-01-12	Town Board Resolution Scheduling Public Hearing on Proposed Moratorium		**
686	2012-03-15	Email from Duquesne to McLaughlin RE: New York School Age Multipliers	TOG00376485	**
688		Town Code Section 285-5		*
690	2007-01-24	Town Board Meeting Minutes		*
692	2011-10-24	Email: Garrett Duquesne to Francis Sheehan re CPSC Meeting October 28 2011	TOG00142197-TOG00142198	*

695	2012-08-15	Planning Board Memo	TOG0006077-TOG0006079	*
696	2012-08-15	Planning Board Meeting Minutes and Transcript		*
697	2013-05-01	Planning Board Meeting Minutes	TOG0005550-TOG0005554	*
699	2017-11-01	Site Plan Extension Approvals	TOG0005372 & 11/6/19 PB Mtg. Min.	**
700	2019-09-10	Cantatore Expert Rebuttal Report		*
701	2019-09-10	Madeo Rebuttal Expert Report		*
703		Sewer and Street Maps	TOG000258053	*
704	2005-07-04	Email Feiner to Simms re 1 Dromore Road	TOG0015317	*
706	2019-11-29	Clark Expert Report		*
707	2016-04-27	Town Answer in Covenant Litigation		*
708	2019-09-09	Town's Covenant Litigation Settlement Letter		*
712		HMDA Data		
713	2006-05-24	S&R's Deed to Property		*
742	2013-01-19	Sisters' Letter to PB re S&R's Site Plan App.	TOG0005201	*
759	2013-07-22	Complaint in S&R Dev Estates v Town (2013 Covenant Litigation)		*
762	2016-01-05	Email Sysak to Schmidt re Planning Board Draft Decision	TOG00234360	*
763	2016-01-05	Email Ryan to Duquesne re Dromore Road	TOG00234376	*
765	2019-07-17	State Court Transcript re Settlement in Restrictive Covenant litigation (NYSCEF Doc. 359)		*
768	2019-03-14	Affidavit of Teuta Ahmedi		*
769	2005-10-06	Stephen Troy Affidavit in Opposition in Philip Thomas Litigation	S&R015270 - S&R015271	*
770		Affidavit of Rick Troy in in Dromore Road LLC v Thomas	S&R015265-S&R015269	*
900	1910-03-24	Original Deed to Sisters' Property (Lot 6)	Covenant Lit Dkt. 152	*
901	1912-03-12	Original Deed to S&R's Property (Lot 5)	Covenant Lit Dkt. 153	*
902	1916-04-24	Original Deeds for Remaining Subdivision Lots (Lots 1-4, 7-10)	Covenant Lit Dkt. 198	*
903	1972-08-08	Mutual Release of Restrictive Covenants Between Owner of Lot 1, Lots 2, 3, & Portions of Lots 4 & 5, & Lot 7	Covenant Lit Dkt. 159	*
904	1979-08-24	Mutual Release of Restrictive Covenants Between Owners of Lots 2, 3, & Portions of Lots 4 & 5, & Lot 6	Covenant Lit Dkt. 160	*
905	1980-07-31	Sanitary Sewer Map for GNC	TOG00258049	*
906	1980-09-30	Mutual Release of Restrictive Covenants Between Owners of Lots 2, 3, & Portions of Lots 4 & 5, & Lot 5	Covenant Lit Dkt. 161	*
908	1996-11-05	Minutes of Meeting Between the Sisters, the Paulist Fathers, and Town Officials	SISTERS000028-SISTERS000030	
912	1998-09-08	Letter: Brett Auerhahn to Gabriel Senor re Ownership of Dromore Road	TOG00258058	*
914	2004-07-01	Title Report Faxed to First American by Tom Reale	Covenant Lit Dkt. 172	*
915	2006-02-01	Town Water District Map, Sheet No. F-2	TOG00258052	*
916	2006-02-01	Town Street Map, Sheet No. F-2	TOG00258054	*
917	2006-04-12	Feiner Blog Post: Waterwheel foreclosure opens possibility of affordable housing	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=5354&TID=10&jump2=0	*
918	2006-05-31	Feiner Blog Post: Proposal to Help Residential Taxpayers Avoid Big Tax Hikes	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=5620&TID=10&jump2=0	*
919	2006-09-19	Feiner Letter to Balasco re Community Concerns about Development on Central Ave	TOG0012144	
920	2006-09-19	Feiner Letter to Schwartz re Community Concerns about Development on Central Ave	TOG0012145	*
921	2006-09-19	Feiner Letter to ECC and Edgemont School Board Members re Community Concerns about Development on Central Ave	TOG0012146	*
922	2006-10-08	Feiner Blog Post: Barnes & Noble to Close on Central Ave	http://pfeiner.blogspot.com/2006/10/barnes-noble-to-close-on-central-ave.html	*
924	2006-10-22	Feiner Blog Post: Help Wanted- Town May Evict Tenants on Foreclosed Property	http://pfeiner.blogspot.com/2006/10/help-wanted-town-may-evict-tenants-on.html	*
925	2006-10-25	Town Board Meeting Minutes, Transcript, and Video	https://greenburghny.newswagit.com/videos/78069	*
926	2006-10-27	Feiner Blog Post: Should the town cooperate with Ardsley in building affordable housing for village/town employees, volunteer firefighters, ambulance corp members?	https://pfeiner.blogspot.com/2006/10/should-town-cooperate-with-ardsley-in.html	*
927	2006-10-28	Feiner Blog Post: Carvel's First Store to Close on Central Ave, Comments 8, 15, 16, 17, 23, and 31	https://pfeiner.blogspot.com/2006/10/carvels-first-store-to-close-on.html	*
928	2006-11-02	Planning Board Memo re Comprehensive Plan Update		*
929	2006-11-08	Town Board Meeting Minutes & Transcript		*

930	2006-11-11	Feiner Blog Post: Central Ave Changes: Turcos Sold to Morton Williams, Comments 2, 7, 9, 12, 13, 15.	https://pfeiner.blogspot.com/2006/11/central-ave-changes-turcos-sold-to.html	*
931	2006-11-15	Feiner Blog Post: Tenants, Taxpayers Win Victory at Affordable Housing on Manhattan Ave	https://pfeiner.blogspot.com/2006/11/tenants-taxpayers-win-victory-at.html	*
932	2006-11-22	Feiner Blog Post: Help the Less Fortunate During the Holiday Season	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=6561&TID=10&jump2=0	*
933	2006-11-25	Feiner Blog Post: Edgemont Civic Leaders Proposed Moratorium on Residential Development on Central Ave	https://pfeiner.blogspot.com/2006/11/edgemont-civic-leaders-propose.html	*
934	2006-12-10	Feiner Blog Post: Wanted: Goals 2007	https://pfeiner.blogspot.com/2006/12/wanted-goals-2007.html	*
938	2006-12-21	Feiner Email to Town Board	TOG0008771	*
939	2007-01-01	Feiner Blog Post: Goals 2007	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=6636&TID=10&jump2=0	*
940	2007-01-02	Gblist Email of Feiner Blog Post: Abinanti Offers to Help Town Protect Nature Center	TOG0008791	*
941	2007-01-07	Feiner Blog Post: Legislator Abinanti Urges County to Assist Town Protect Property Near Nature Center, Comment 34	https://pfeiner.blogspot.com/2007/01/legislator-abinanti-urges-county-to.html	*
942	2007-01-08	Email: Michael Sims to Paul Feiner re Troy/Nature Center	TOG0008879	*
943	2007-01-10	Town Board Meeting video	https://greenburghny.new.swagit.com/videos/78074	*
944	2007-02-02	Site Plan Submission Parts I and II	TOG0003355-TOG0003422	*
946	2007-02-14	Email Land Trust Alliance to R Troy re Conservation Easements	S&R004814-S&R004816	*
948	2007-11-19	Letter Margaret Goldberg to Stellato re Resolution re Zoning of 62 Dromore Rd	GNC-FED001149	*
949	2012-01-25	Town Board Meeting, Public Comment 1 & 2	https://greenburghny.new.swagit.com/videos/78208	*
950	2012-01-26	Email: Rick Troy to Bob Roth RE: Dromore Road	S&R014604	*
951	2012-03-19	Planning Board Report Update	TOG0006071-TOG0006073	*
953	2012-07-25	Town Board Public Hearing, 24:48 – 25:35	https://greenburghny.new.swagit.com/play/07252012-610 ,	*
955	2012-12-26	Email from Ryan to S&R with subject "Revised Site Plan"	JMC009641	*
956	2013-01-14	ECC Letter to Planning Board re Dromore Road	JMC003379	*
957	2013-01-14	Memo from Garrett Duquesne to Ken Cioce & Daniel Raftery	S&R018154	**
958	2013-02-01	GNC Letter to PB re S&R's Site Plan App.	JMC003385	*
959	2013-02-04	ECC Letter to PB re S&R's Site Plan App.	JMC002920	*
960	2013-02-14	Letter from Scarsdale Woods to PB re S&R's Site Plan App.	JMC003559	*
963	2013-04-16	Letter from ECC to PB re S&R's Site Plan App.	JMC002284-JMC002299	*
964	2013-08-23	Sister Mary Francis Blackmore Aff.	Covenant Lit Dkt. 220	*
966	2014-05-19	Email: Howard Hirsch to Madden RE: Edgemont - corrected paragraph for % increase	TOG00167271 – TOG00167273	*
968	2015-03-10	BOE Meeting Minutes	ESD FOIA Response	
970	2012-01-20	Email: Sheehan to Town Board RE: REVISED TENTATIVE AGENDA	TOG00334718-TOG00334719	*
971	2016-02-03	PB Meeting minutes and transcript		*
973	2016-04-06	PB Meeting minutes and transcript		*
974	2016-06-22	TB Meeting minutes and video	https://greenburghny.new.swagit.com/videos/06222016-841#0	*
975	2016-07-12	TB Meeting minutes and video	https://greenburghny.new.swagit.com/videos/07122016-1321#0	*
977	2016-08-04	TB Meeting minutes and video	https://greenburghny.new.swagit.com/videos/08042016-1022#0	*
979	2016-09-28	TB Meeting minutes and video	https://greenburghny.new.swagit.com/videos/09282016-1230#0	*
981	2016-11-27	Email: Feiner to Tim Lewis RE: S&R Development-One Dromore Road-State Court Decisions	TOG0276956	**
982	2016-12-02	Email: Feiner to Margaret Goldberg RE: dromore mapping	TOG0277384	*
983	2018-04-18	Email: Anne Darelus to Brian Simmons RE: Proposed Dromore Road Sidewalk and Drainage Improvements - NYSDOT Perm 33	TOG0387550	*
984	2019-10-07	Stip. of Discontinuance of Covenant Litigation as to Town		*

986	1912-00-00	1912 Subdivision Map	Covenant Lit Dkt. 154	*
987	1916-00-00	1916 Subdivision Map	Covenant Lit Dkt. 155	*
988	2018-05-11	Sister Marie Aimee McEvoy Affidavit	Covenant Lit Dkt. 247	*
990	2018-05-11	Sister Mary Angela Jolly Affidavit	Covenant Lit Dkt. 296	*
991		S&R Download: A Model Conservation Easement with Key Provisions Explained	S&R004835-S&R004850	*
992		Photos of Monastery and Dromore Road from Sister McEvoy's Affidavit in Covenant Lit	Covenant Lit Dkts 250-285	*
993	1996-09-09	Local Law 9-1996		*
994	2015-12-02	PB Work Session Minutes	TOG0005406	*
996	2006-07-11	Email: R. Troy to Sullivan re 1 Dromore	S&R013331	**
998	2007-01-31	Letter: S&R to Planning Board (plus drafts)	S&R013201;S&R014680; S&R014684; S&R018923	*
999	2007-02-12	Email from R. Troy to S. Troy re Draft Planning Board Letter	S&R013169-S&R013176	*
1000	2008-11-10	Offenberg Appraisal	S&R001688-S&R001699	**
1001	2008-12-08	Memo: Madden to Lucido re Site Plan	TOG0003541	**
1003	2009-11-18	PB Development Staff Report	TOG0004422	*
1004	2009-10-30	PB 07-07 S & R Development Staff Report 10-30-09.pdf	TOG0004430	*
1007	2012-01-26	Letter: Harrington to PB and ZBA without attachment	TOG0005057	*
1009	2012-02-29	Site Plan Application Form	TOG0004725	*
1011	2012-03-01	Planning Board Report Update	TOG0006067	*
1012	2012-03-07	Planning Board Work Session Minutes	TOG0003665	*
1016	2012-06-22	JMC Drawings	TOG0004551	**
1019	2012-11-01	Memo: Lucido to Duquesne re Multi-Family Site Application	TOG0005086	**
1021	2013-01-11	Planning Board Report Update	TOG0006062	*
1022	2013-01-14	Memo: Lucido to Duquesne re 2nd Application Review Request	TOG0005085	**
1023	2013-01-29	Memo: Lucido to Duquesne re 3rd Application Review Request	TOG0005114	**
1024	2013-01-31	Planning Board Report Update	TOG0006063	*
1025	2013-02-06	JMC On-Site Fire Access Drawing	TOG0004721	*
1026	2013-02-06	PB Work Session Minutes	TOG0005484	*
1028	2013-02-20	PB Work Session Minutes	TOG0005412	*
1029	2013-02-20	PB Public Hearing Transcript	TOG0005698	*
1030	2013-03-20	PB Work Session Minutes	TOG0005534	*
1032	2013-04-17	PB Work Session Minutes	TOG0005547	*
1033	2013-04-17	PB Public Hearing Transcript	TOG0005634	*
1035	2015-11-13	Planning Board Report Update	TOG0006065	**
1036	2015-12-02	Planning Board Meeting Transcript	TOG0005673	*
1037	2016-01-06	PB Work Session Minutes	TOG0005378	*
1038	2016-04-18	Email: R Troy to Ryan re Townhouse Layout	S&R014331-32	**
1040	2017-10-23	Letter: James Ryan to Planning Board re 1st Request for Extension	TOG0005370	**
1041	2017-11-01	PB Work Session Minutes	TOG0005398	*
1043		Town Environmental Impact Statement for CD Overlay	SISTERS000131	*
1044	2017-08-11	Draft Letter: Ryan to Glathaar re JMC Project 6103	JMC009067	*
1045	2017-08-23	Draft Letter: Ryan to Glathaar re JMC Project 6103	JMC009069	*
1046	2017-08-23	Draft Letter: Ryan to Glathaar re JMC Project 6103	JMC009071	*
1047	2017-08-23	Letter: Ryan to Glathaar re JMC Project 6103	JMC009073	**
1049	2017-08-23	Letter: Ryan to Glathaar re JMC Project 6103	JMC009077	**
1050	2007-04-14	Email: Bernstein to Sheehan re Edgemont 101/Comp Plan	TOG0321941	*
1051	2007-07-13	Email: Bernstein to Sheehan re FYI - Response to Feiner	TOG0321943	*
1052	2007-07-13	Email: Carol Wielk to Sheehan re Supervisor Uses Town Email for Political Attack	TOG0321945	*
1053	2007-07-16	Email: Carol Wielk to Sheehan re you misunderstood	TOG0321948	*
1054	2007-02-01	S&R Download: Reduce Your Taxes with Conservation Easements	S&R004832-S&R004834	*
1055	2006-09-15	Sullivan Site Drawings	S&R008550-58	**
1056	2016-09-28	2016 Comprehensive Plan	https://www.greenburghny.com/DocumentCenter/View/1948/Adopted-Comprehensive-Plan-Reduced-Size-PDF	*

1058		NYSED Archive of NYS School Districts' Enrollment Data 1976/77 Through 2019/20 School Years	http://www.p12.nysed.gov/irs/statistics/enroll-n-staff/home.html	*
1059		NYSED Archive of Edgemont UFSD Annual Reports 1998/99 through 2018/19 School Years		*
1060	2000-10-25	2000 Comprehensive Plan	TOG0067478-TOG0067578	*
1061	2003-01-08	2003 Addendum to 2000 Comprehensive Plan	TOG00186407-TOG00186512	*
1062	2004-03-23	Supervisor's Report: RFPs for development of affordable housing	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=2246&TID=10&jump2=0	*
1063	2004-03-31	Supervisor's Report: Town Working for Affordable Housing	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=2268&TID=10&jump2=0	*
1064	2004-10-29	Supervisor's Report: Hastings Affordable Housing...Habitat for Humanity	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=3060&TID=10&jump2=0	*
1065	2006-04-29	Memo by Mark Stellato to Steve Bass re Expansion of Affordable Housing Opportunities	TOG0012016-TOG0012018	*
1066	2006-06-16	Email: Steve Troy to Brian Kraut RE: 1 Dromore Rd, Scarsdale, NY	S&R013435-S&R013436	**
1067	2006-07-10	Email: Andrew Kurtz to Steve Troy RE: Environmental Attorney	S&R013351-S&R013355	**
1068	2014-04-29	Video of Comprehensive Plan Steering Committee Hearing	https://greenburghny.new.swagit.com/videos/79397	*
1069	2006-07-17	Email: Sullivan to R.Troy RE: Dromore Meeting - 10:00 A.M., Tuesday	S&R018952	*
1070	2006-09-06	Planning Board Work Session Minutes		*
1071	2006-09-13	JMC Transmittal to Sullivan	S&R017199	*
1072	2014-05-10	Video of Comprehensive Plan Steering Committee Hearing	https://greenburghny.new.swagit.com/videos/79398	*
1073	2006-09-18	Email: Brian Carcaterra to R.Troy RE: Deals	S&R013281	**
1074	2014-05-22	Video of Comprehensive Plan Steering Committee Hearing	https://greenburghny.new.swagit.com/videos/79399	*
1076	2014-06-02	Video of Comprehensive Plan Steering Committee Hearing	https://greenburghny.new.swagit.com/videos/79400	*
1077	2006-10-10	Sullivan Invoice	S&R017200	**
1078	2006-10-14	Feiner Blog Post: Questions/Issues of the Day-your input wanted	http://pfeiner.blogspot.com/2006/10/questionsissues-of-day-your-input.html	*
1080	2006-10-18	Feiner Blog Post: Join In The Feiner Foot-Fest FORM	https://pfeiner.blogspot.com/2006/10/join-in-feiner-foot-fest-form.html	*
1081	2006-10-18	Feiner Blog Post: Tax Breaks for Manhattan Ave	http://pfeiner.blogspot.com/2006/10/tax-breaks-for-manhattan-ave.html	*
1084	2006-11-02	Letter from Bob Roth to Carlin Simpson	S&R007385-S&R007386 & JMC005288-JMC005289	*
1086	2006-11-15	Carlin Simpson Geotech Proposal	S&R007387-S&R007389, S&R025693-S&R025696	*
1087	2006-12-14	Feiner Blog Post: 444 Units of Housing to Be Built in E. Irvington	http://pfeiner.blogspot.com/2006/12/444-units-of-housing-to-be-built-in-e.html	*
1088	2006-12-14	Feiner Blog Post: Response to Bloggers-Edgemont May Get More Open Space	http://pfeiner.blogspot.com/2006/12/response-to-bloggers-edgemont-may-get.html	*
1089	2006-12-15	Fax: R Troy to S Troy re Expenses	S&R025697-S&R025701	*
1090	2006-12-19	Town Board Special Meeting Minutes and Transcript		*
1092	2007-01-03	Email from J. Giris to S. Troy re Feiner's Blog Post titled Abinanti Offers to Help Protect the Nature Center	JMC008980	*
1093	2007-01-03	S&R Download: Westchester Land Trust's Biography Page of Paul Gallay	S&R004817	*
1094	2007-01-06	Gblist Email on behalf of Paul Feiner re CAC Favors Acquisition of Dromore Road property	TOG0008852	*
1095	2007-01-09	S&R Download or article titled News from the Land Trust Alliance Northeast Program	S&R004825	*
1096	2007-01-09	Printout: Upper Valley Land Trust, "Conservation Options for Landowners"	S&R004827	*
1097	2007-01-10	Town Board Meeting Minutes		*
1098	2007-01-12	Town Board Special Meeting Minutes		*
1099	2007-01-12	Email from Stellato to Planning Board enclosing copy of draft moratorium law		
1100	2007-01-15	S&R Download: Westchester Land Trust Article titled How to Preserve Your Property by Creating a Conservation Easement	S&R004818	*

1101	2007-01-11	Email to Insardi re sample affordable housing legislation	TOG0015351	*
1102	2007-01-24	Planning Board Meeting Minutes		*
1103	2007-01-27	Handwritten attendance sheet	TOG0141260	*
1104	2007-02-02	Gblist Email on behalf of Paul Feiner re Country Offers Opinion on Central Ave Moratorium	TOG0009173	**
1105	2007-02-05	Westchester1 Article titled "Abinanti offers to help town protect nature center"	S&R000566	*
1106	2007-02-09	Email: Madden to Giris RE: 62 Dromore Road Application	TOG0009232-TOG0009238	*
1107	2007-02-21	Planning Board Meeting Minutes and Transcript		*
1108	2007-02-23	Email: S Troy to John Sullivan re Response to Comments by Thomas Madden	S&R013138	**
1109	2007-02-28	Planning Board Meeting Minutes		*
1110	2007-07-19	Rick Troy's Supplemental Aff. in ZBA Hearing	TOG0006571-TOG0006585	*
1111	2007-10-13	Supervisor Report: Comprehensive Plan - Consultant Interviews/Background	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=9013&TID=10&jump2=0	*
1112	2007-10-18	Dissenting Decision of Rohan F. Harrison	TOG0006152-TOG0006164	*
1113	2007-10-24	Feiner Blog Post: Town to Turn Foreclosed Proeprty Into Affordable Housing	http://pfeiner.blogspot.com/2007/10/town-to-turn-foreclosed-property-into.html	*
1114	2007-11-21	Feiner Blog Post: Unused Office Park Land for Affordable Housing...Waterwheel for Affordable Housing...Housing Authority Bus Tour Dec 9	http://greenburghny.cit-e.net/Cit-e-Access/news/archnews.cfm?NID=9420&TID=10&jump2=0	*
1115	2008-04-10	ECC Meeting Minutes re Comprehensive Plan	https://edgemontecc.files.wordpress.com/2014/11/comprehensive_plan_meeting_-_ecc_comments.pdf	*
1116	2008-04-20	Fax from R. Troy to Steve Troy re Expenses	S&R025706 - S&R025715	**
1117	2008-06-04	Town Board Minutes & Public Hearing Transcript on the Planning Board's recommendation to extend the 10% set aside		*
1118	2008-09-04	Town Board Minutes & Public Hearing Transcript on the Planning Board's recommendation to extend the 10% set aside		*
1119	2008-10-22	Town Board meeting minutes and continuation of Public Hearing on the extension of the 10% set aside		*
1120	2009-03-04	Planning Board Meeting Minutes		*
1121	2009-03-18	Planning Board Meeting Minutes		*
1122	2009-04-01	Planning Board Meeting Minutes		*
1124	2009-11-04	Planning Board Meeting Minutes		*
1125	2010-08-09	Westchester County Affordable AFFH Units Model Ordinance	https://homes.westchestergov.com/images/stories/settlementpdfs/AppendixD-1-i.pdf	*
1126	2011-09-27	Town Board Special Meeting video and minutes discussing Westhelp lease	TOWN0007526	*
1127	2011-10-06	Feiner I Affidavit of Richard Troy in Opposition to Motion for Summary Judmgent with Exhibits	Feiner I ROA 1404-1602	*
1128	2011-11-08	Edgemont BOE Meeting Minutes		*
1129	2011-11-22	Edgemont BOE Meeting Minutes		*
1130	2011-12-13	Edgemont BOE Meeting Minutes		*
1131	2012-05-16	Planning Board Meeting Minutes		*
1132	2012-10-17	Planning Board Meeting Minutes		*
1133	2013-03-01	Title Report Obtained by GNC	TOG00380199-TOG00380216	*
1134	2017-01-26	Sisters' Answer in Covenant Litigation	Sup. Ct. Westchester Cnty., Index No. 52747/2016, NYSCEF Doc. No. 116	*
1136	2017-10-20	Sisters Answer		*
1137	2018-02-12	S&R's Response to Town's Interrogatories		**
1138	2019-04-15	S&R's Updated Responses to Town's Interrogatories		**
1139	2019-07-24	Town Expert's Review of 2005 Gelbtuch Appraisal by Jon Bernz		*
1140	2019-07-24	Town Expert's Review of 2006 Gelbtuch Appraisal by Jon Bernz		*
1141	2019-09-24	Edgemont School Board Enrollment Presentation	https://go.boarddocs.com/ny/edgemont/Board.nsf/files/BJSQ2E66B070/\$file/Enrollment_20191212131353.pdf	*
1142	2019-12-03	Edgemont Union Free School District, District Wide Space Utilization Summary Report (presented at 12/10/2019 Board of Education Mtg.)	https://go.boarddocs.com/ny/edgemont/Board.nsf/files/BJXRCK6BB204/\$file/Space%20utilization%20summary%20report%20120919%20rev2.%20(1).pdf	*

1143	2013-07-00	Report on Zoning by Municipality in Westchester County, New York in HUD Litigation		*
1144		Complete settlement agreement with the Sisters in Covenant Litigation and/or this Litigation		*
1145		NYSED Archive of Annual Reports for all School Districts in Town	https://data.nysed.gov/lists.php?type=district	*
1146		HUD LIHTC Data	https://lihtc.huduser.gov/	*
1147		Picture of Subsidized Households 2018 Data	https://www.huduser.gov/portal/datasets/assths.html	*
1148		NYS Town Law 272-A(6)(a)	https://www.nysenate.gov/legislation/laws/TWN/272-A	*
1150	1987-07-08	Local Law No. 3-1987		*
1151	2007-02-07	Presentation to Planning Board prepared by Madden and Stellato	S&R001383-S&R001385	*
1152	2007-02-26	Letter from Stellato to Giris re 62 Dromore Lane	S&R016741	*
1153	2010-01-20	Email: Duquesne to Harrington RE: PB 07-07 S&R Development	TOG0003656-TOG0003664	*
1154	2012-03-13	Edgemont BOE Meeting Minutes		*
1155	2012-03-13	Edgemont BOE Resolution		*
1156	2012-06-04	Email: T. Schmidt to R. Troy RE: Water and Sewer	JMC009010-JMC009013	*
1157	2012-09-28	JMC Meeting Minutes	JMC007875	*
1158	2012-10-25	JMC Meeting Minutes	JMC008524	*
1161	2013-01-07	Email: P. Sysak to G. Duquesne RE: S&R	JMC008958	*
1162	2013-01-14	Email: S. Troy to P. Sysak RE: Proposed Multi-family Residential Development	JMC008643-JMC008645	*
1163	2013-01-15	Email: R. Roth to J. Ryan RE: Proposed Multi-family Residential Development	JMC008649	*
1164	2014-03-21	Draft Comprehensive Plan	TOG0006698-7132	*
1165	2015-03-24	Draft Comprehensive Plan	TOG0007133-7564	*
1166	2015-08-25	Draft Comprehensive Plan	TOG0007565-7975	*
1167	2016-04-20	Affidavit of James Ryan with Ex. J in Covenant Lit	Covenant Dkts. 231, 241	*
1168	2020-2021	Westchester-Putnam School Boards Association 2021 Executive Budget School Aid Run and Per Pupil Analysis	https://www.wpsba.org/site/handlers/filedownload.ashx?moduleinstanceid=1340&dataid=4582&FileName=WPSBA%2020-21%20Executive%20Budget%20School%20Aid%20Run%20and%20Per%20Pupil%20Analysis.pdf	
1169	2015-04-28	CPSC Public Hearing Transcripts and Videos	S&R018522-S&R018613; S&R018614-S&R018662 & S&R018439-S&R018482; https://greenburghny.new.swagit.com/videos/79401 ; https://greenburghny.new.swagit.com/videos/79402	*
1170	2015-10-01	CPSC Public Hearing Transcript and Video	S&R018483-S&R018521; https://greenburghny.new.swagit.com/videos/79403	*
1171	2016-03-16	PB Meeting Minutes and Transcript		*
1172	2016-12-01	Demolition Permit	S&R022927	*